

Proposed On-Road Truck Regulation

Construction Industry Talking Points

May 22, 2008

The California Air Resources Board (CARB) is developing a regulation to reduce emissions from heavy-duty on-road diesel trucks. This regulation will cover trucks owned and operated by contractors in California 14,000 GVWR and greater. CARB will hold public workshops in May and June to receive comments on the proposed regulation. It is important that contractors attend these workshops to let the agency know how the regulation will impact your business.

Contractors rely on their trucks in ways much different than other truck fleets, such as long distance over-the-road, interstate and fixed route deliveries that accumulate high miles (and high vehicle turn over) in a shorter period of time. CARB must be made aware of the clear distinctions. Here are some points to share with CARB staff at the workshops:

1. The on-road truck regulation will be yet another regulation with significant financial impacts on contractors and the construction industry. Contractors and fleet owners are all ready responsible for the Periodic Smoke Inspection Program, the Portable Equipment Registration Program (PERP) and the Off-Road Equipment Regulation. CARB must account for the cumulative impacts of these existing regulations when developing requirements for construction fleets in the on-road regulation.
2. Collectively construction on-road trucks have operating characteristics that are different than the majority of other trucks in the California inventory. For example, trucks used to support construction typically travel fewer miles each year than other on-road fleets. For example a 2002 truck used in construction that travels 10,000 miles per year should not be held to the same replacement standard as an identical truck that travels 50,000, 75,000 or 100,000 per year. The costs to replace the lower mileage vehicle are significantly higher on an emissions reduced basis (five to ten times less emissions reduced due to miles traveled).
3. Many trucks used by contractors are body load type with expensive equipment bolted on to it. Drill rigs, cement mixers, mechanic and tank trucks are good examples of these. The on-road truck regulation needs to account for the significant cost differences of various types of equipment and trucks.
4. CARB must clarify the on-road truck inventory used to determine statewide emission reductions and the costs of the regulation.
5. CARB must provide a clear, easy to understand and follow list of Verified Diesel Emission Control Systems (VDECS) for particulate matter (PM) and NO_x. For example, are PM retrofit devices currently available for a truck manufactured in 1994, 2000 or 2004?

Please take a moment and visit the CIAQC website at www.ciaqc.com for more information about the on-road regulation and take CIAQC's on-road truck survey today! CARB is scheduled to adopt the truck regulation in October 2008, so don't delay. Contact CIAQC staff if you have any questions about the survey or the on-road truck regulation at ciaqc@uia.net or 626 858-4611.