

MOBILE SOURCE & FUEL SERVICES

Regulatory Support for California's "Fleet Rules"

Trinity Consultants is a leading global environmental consulting firm that brings 50 years of experience providing services and solutions in the EHS Regulatory Compliance, Built Environment, Life Sciences, and Water & Ecology markets. Trinity has the technical expertise, industry depth, and specialized capabilities to help clients achieve their goals across the natural and built environments.

Trinity's California team in Sacramento, Irvine, Bakersfield, and Oakland has extensive experience supporting the compliance goals of companies that purchase, maintain, and operate vehicles, equipment, and engines in California.

Owners of on-highway trucks and off-road vehicles and equipment (i.e., fleet owners)—including private owners, small and large businesses, and public agencies—must comply with a number of 'fleet rules' set forth by the California Air Resources Board (CARB).



Together, CARB's rules affect nearly every on-highway diesel-fueled truck with a gross vehicle weight rating (GVWR) of 6,000 pounds or more, as well as off-road vehicles and engines of all fuel types as small as 25 horsepower.

The main rules affecting on-highway trucks include the Truck & Bus Rule, Clean Truck Check, Emission Control Label (ECL) Rule, and Advanced Clean Fleets Rule. Vehicles operating in certain applications are subject to special rules, such as the Public Fleets Rule, Tractor-Trailer GHG Rule, Solid Waste Collection Vehicle Rule, Innovative Clean Transit Rule, and Zero-Emission Airport Shuttle Rule.

The main rules affecting off-road vehicles and portable equipment include the In-Use Off-Road Diesel Vehicle Rule, Large Spark Ignition Engine (LSI) Rule, Zero Emissions Forklift Rule, Portable Diesel Engine Airborne Toxic Control Measure (ATCM), and the Portable Equipment Registration Program (PERP). Likewise, off-road vehicles and portable equipment operating at ports and intermodal railyards are subject to special rules, including the Cargo Handling Equipment (CHE) Rule and the Transportation Refrigeration Unit (TRU) Rule.

In general, the above rules require fleet modernization through the inclusion of zero-emission vehicles, accelerated turnover of older vehicles and equipment, and/or installation of retrofit devices and technologies. This is typically done by establishing 'fleet average' requirements and/or model-year phase-out requirements. The rules incorporate many compliance extensions and exemptions to address low-use and specialty vehicles and equipment. Compliance reporting is also required through a collection of online systems, including ARBER, DOORS, TRUCRS, and CTC-VIS, as well as via other methods. Labeling and recordkeeping requirements also apply.

Trinity provides compliance assistance and technical support to enable fleet owners to comply with all aspects of California fleet rules, including:

- ▶ Compliance Planning and Internal Auditing
- ▶ Compliance Reporting
- ▶ Repower/Retrofit Feasibility Analysis
- ▶ Enforcement Support (Responding to Violation Notices and Negotiating Settlements)
- ▶ Regulatory Summaries, Employee Training, and SOP Development
- ▶ Rulemaking Support, Monitoring, and Advocacy (Technical Representation During Workshops and Hearings)



Trinity provides ongoing and on-call support to fleets ranging in size from a single vehicle to some of the largest fleets operating in California, including those in the goods movement, construction, railroad, mining, and public fleet sectors. Trinity services are customized to meet each client's specific needs and adapt to the available level of in-house support. We also work with third-party fleet managers and legal counsel to ensure that compliance with regulatory requirements is both achieved and maintained. Trinity closely monitors all CARB regulatory activities and is well-positioned to help clients respond to what will likely be a series of proposed regulatory changes by CARB, as well as comply with those updated regulations once they are formally adopted.

Trinity Can Help

For more information about how Trinity can help your organization, please contact Jim Lyons, Principal Consultant, at 916.837.3618 or Allan Daly, Senior Consultant, at 916.273.9980.

ISO 9001:2015 certified at our corporate office in Dallas, Texas