

## MOBILE SOURCE & FUEL SERVICES

### Regulatory Support for California's "Fleet Rules"

Founded in 1974, Trinity Consultants helps organizations overcome complex, mission-critical challenges in EHS, engineering, and science through expertise in consulting, technology, training, and staffing. We support clients in geographies worldwide and across a broad range of sectors including industrial, energy, manufacturing, mining, life sciences, and commercial/institutional.

Trinity's California team in Irvine, Bakersfield, Oakland and Sacramento 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.

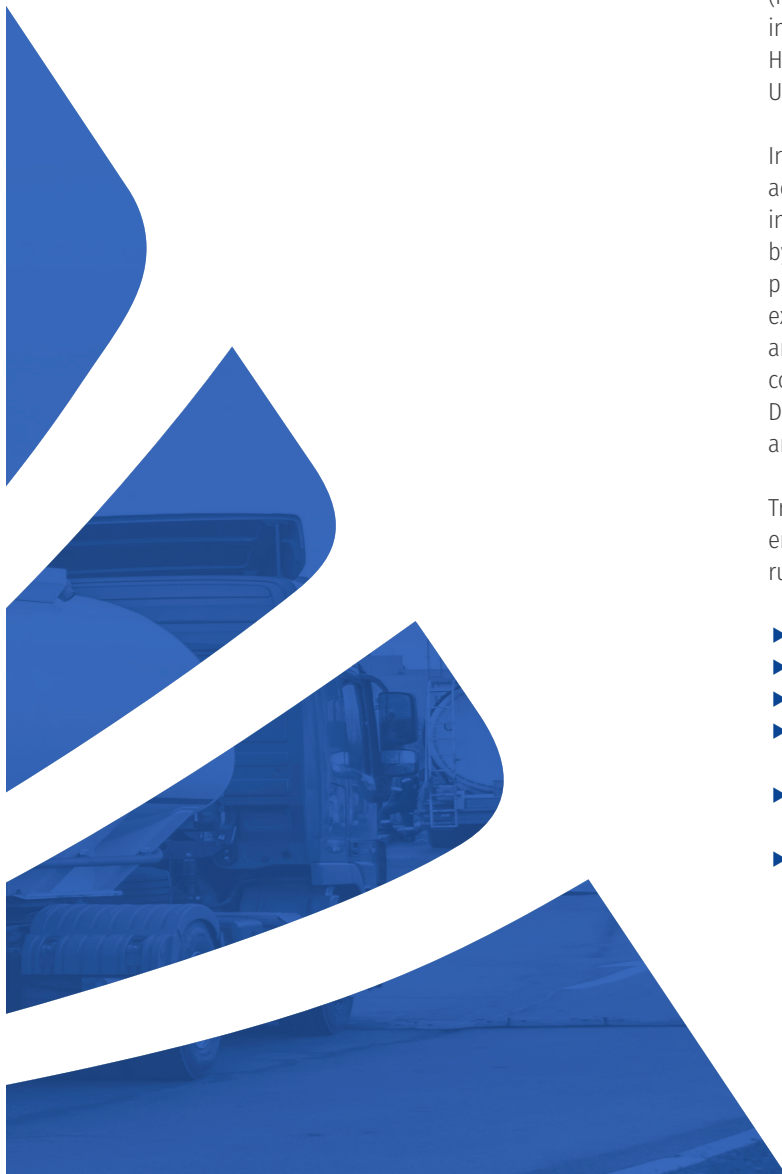
The main rules affecting on-highway trucks include the Truck & Bus Rule, Periodic Smoke Inspection Program (PSIP), and Emission Control Label (ECL) Rule. Vehicles operating in certain applications are subject to special rules, such as the Drayage Truck Rule, Public Fleets Rule, Tractor-Trailer GHG Rule, Solid Waste Collection Vehicle Rule, and Urban bus/Transit Agency 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, Portable Diesel Engine Airborne Toxic Control Measure (ATCM), and the Portable Equipment Registration Program (PERP). Likewise, off-road vehicles and portable equipment operating in certain applications 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 accelerating 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, the Drayage Truck Registry (DTR), 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 several vehicles, 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 clients' specific needs and adapt to the available level of in-house support. We likewise work with third-part fleet managers and legal counsel to ensure that compliance with be achieved and maintained. Trinity expects modifications to the existing in-use regulations as required under CARB's recently developed Mobile Source Strategy. Potential modifications could include requirements for fleet owners to purchase "advanced technology" vehicles and equipment, as well as more aggressive vehicle turnover provisions.

## **Trinity Can Help**

For more information about how Trinity can help your organization, please contact Jim Lyons, Principal Consultant, at 916.273.5138 or Allan Daly at 916.273.9980.

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