

CALIFORNIA STREET SWEEPING INDUSTRY CALL TO ACTION

by Mark Carter, NAPSA Senior Advisor

Street Sweeper Owners: Your ability to operate your fleet and to buy and sell used equipment is currently being debated by bureaucrats at the California Air Resources Board (CARB). The board of NAPSA's CA chapter has been meeting with CARB and they have reluctantly agreed to consider some changes that will dramatically improve your ability to operate under the proposed law. Your help is needed! To continue this dialogue with CARB they are requiring additional data to make our case. The data can be submitted anonymously.

Background:

In 2004 CARB passed the Airborne Toxic Control Measure (ATCM) regulating auxiliary diesel engines over 50 hp. Starting January 1, 2010 all these engines must be at least Tier 1 (typically 1998-2003). If you have a pre 2003 sweeper and do not have a statewide or local permit you will have some costly choices to make. (retire the engine, retrofit or repower)

NOTE: You are no longer allowed to bring "non-resident engines" into California unless they are at least Tier 3 (typically model year 2007)

In 2007 CARB passed the Statewide Portable

Equipment Registration Program (PERP). This gave you the option to register your portable (auxiliary) engines with one statewide program or to register with each local district.

NOTE: To register a 2004 auxiliary engine next year, the fee will be \$2,480 plus an initial fee of \$270, plus \$345 district inspection fee, plus \$375 annual inventory fee

In 2005 CARB passed the Fleet Rule for Public Agencies. One of the provisions required public fleets to sell all pre Tier 3 (2007) vehicles out of state in order to get credit to meet the rule requirements. Translation: Since Tier 3's were not available until 2008, and if cities keep sweepers for 5 years, used municipal sweepers won't be available again until mid 2013.

Links to these rules can be found at:

http://napsaonline.com/ca/ca_links_resources.htm

CARB has now turned its attention to the front or propulsion engines on all vehicles over 14,000 GVW. A well done example of how this will affect fleets can be found at:

Dump Truckers Cheat Sheet: .

http://www.cdtoa.org/old_archives/2008/07_08/CARB_cheatSheet.pdf.

Unfortunately, what works for dump trucks is seldom possible for sweepers due to dual steering, shorter wheel bases, slower speeds etc., so adjust accordingly.

If you are considering retrofitting with particulate and/or NOx filters, be sure to ask if the installer will warrantee the road safety of the unit and indemnify you if you are involved in an accident. So far we have not found one willing to do this.

Financially this proposed law will be a disaster for the sweeping industry. (and our suppliers)

NAPSA CA hired a forensic CPA to do a detailed analysis involving six real life sweeping companies all across the state. The currently profitable companies have been in business many years, some for decades and have 5-30 trucks each. The conclusion: All six companies will be out of business within 3 years of the laws enactment.

I hope this has your attention. Thankfully it has gotten CARB's. CARB has agreed to "consider" and "explore" the following:

- 1) Putting sweepers into their own class within the rule
- 2) Allowing sweepers to be covered under one rule (adjusting ATCM & PERP)
- 3) Allowing municipal fleets to sell pre 2007 sweepers in CA
- 4) Allowing limited Tier 0 use as back-ups

NAPSA-CA has been urging the sweeper industry and its suppliers to get involved for months. While many companies have stepped up to the plate, CARB is insisting we need more documentation in order to

move forward. Specifically they need their fleet surveys filled out. These can be faxed in, done online or one of our board members can take your information over the phone.

We have samples to follow (most of the form does not apply) and most importantly you and your fleet can remain anonymous.

Currently CARB employees are not allowed to work any OT because of the state budget. Otherwise we would not be given this time extension. The time to act is now! Next week may be too late!

Fleet Survey instructions:
<http://www.napsaonline.com/ca/>

Thank you
NAPSA-CA CHAPTER

NAPSA'S National Phone #: 269-383-6993