

Re: [EXTERNAL] RE: Clarity Re: Minimum Useful Life Language

ARB ZEV Fleet <zevfleet@arb.ca.gov>

Thu 8/10/2023 3:04 PM

To: Casey Cheng <cacheng@montrose-env.com>

Hi Casey,

As we are currently in a 15-day comment period for the ACF regulation, I need to include a disclaimer at the end of this email. Please review it and let me know if you would like your email submitted to our ACF comment docket as a comment on the proposed 15-day changes. I will need a response from you, otherwise I am obligated to add your email to our comment period (even though none of these questions are really directed at our proposed 15-day changes).

To answer your questions:

To clarify, an engine will be allowed to exist for at least 13 years but will be required to retire once it reaches 800,000 miles or 18 years?

- Under the Model Year Schedule, the California fleet must be reported by February 1, 2024, to establish the legacy fleet of combustion vehicles. Once reported, then yes, the reported vehicles would get at least 13 years to operate from the model year of the engine and would need to be removed from your California fleet once it reaches 800,000 miles or 18 years. This does allow for selling the vehicle to a non-regulated fleet in California.

Also, is there a guideline regarding how the existing TRUCRS/Advanced Clean Trucks reporting will transition to the ACF regulation?

- We are working on updating the TRUCRS reporting system to accept reporting for ACF. We are also developing guidance documents and a "how to report" guide. If your fleet is already reported in TRUCRS, you will likely just need to answer a few additional questions for each vehicle that are needed for ACF implementation but should not need to re-report all information for every vehicle.

Hope this helps!

Disclaimer:

Thank you for the email. The [Second 15-day](#) public comment period for the Advanced Clean Fleets rulemaking is currently open until August 21, 2023. To be considered and addressed in the Final Statement of Reasons, please submit your comment to the electronic docket for this rulemaking by August 21, 2023 (linked below). If you do not wish to have your email considered by the Board and addressed in the Final Statement of Reasons, please let me know.

Note: Written comments will only be considered and responded to on the modifications identified in the [Second 15-day Notice](#).

Electronic Docket: <https://www.arb.ca.gov/lispub/comm/bclist.php>

CARB's Rulemaking Webpage: <https://ww2.arb.ca.gov/rulemaking/2022/acf2022>

Please note that under the California Public Records Act (Gov. Code, § 6250 et seq.) and the California Administrative Procedure Act (Gov Code §11347.3(b)(6)), your email, written comments, attachments, and associated contact information (e.g., your address, phone, email, etc.) submitted to CARB in connection to a rulemaking must be compiled for this rulemaking file and will become part of the public record and may be subject to disclosure to the public upon request.

Chris Franceschi
Air Pollution Specialist

From: Casey Cheng <cacheng@montrose-env.com>
Sent: Thursday, August 10, 2023 8:51 AM
To: ARB ZEV Fleet <zevfleet@arb.ca.gov>
Subject: RE: [EXTERNAL] RE: Clarity Re: Minimum Useful Life Language

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Hi Callie,

Thank you for such a helpful response. To clarify, an engine will be allowed to exist for at least 13 years but will be required to retire once it reaches 800,000 miles or 18 years?

Also, is there a guideline regarding how the existing TRUCRS/Advanced Clean Trucks reporting will transition to the ACF regulation?

Best,

Casey Cheng (*he/him*)
Staff Scientist II
Montrose Environmental
Santa Ana, CA | US Pacific Time
Mobile: 657-654-4332
cacheng@montrose-env.com | montrose-env.com

From: ARB ZEV Fleet <zevfleet@arb.ca.gov>
Sent: Thursday, August 10, 2023 7:28 AM
To: Casey Cheng <cacheng@montrose-env.com>
Subject: [EXTERNAL] RE: Clarity Re: Minimum Useful Life Language

Hey Casey!

The HPF regulation defines a "minimum useful life", which tracks existing statute in the Health and Safety Code - this provides at least 13 years, and up to 18 years or 800,000 miles from the year the engine was certified (engine model year) before CARB regulations can require retrofit, replacement, retirement, or repowering of a commercial vehicle.

As part of [Senate Bill No.1 \(SB1\)](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB1) (https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB1), the thirteen years refers to "Thirteen years from the model year the engine and emission control system are first certified for use in self-propelled commercial motor vehicles by the state board or other applicable state and federal agencies."



CALLIE BRACEWELL
Air Resources Technician II
Mobile Source Control Division
callie.bracewell@arb.ca.gov

From: Casey Cheng <cacheng@montrose-env.com>
Sent: Friday, August 4, 2023 5:13 PM
To: ARB ZEV Fleet <zevfleet@arb.ca.gov>
Subject: Clarity Re: Minimum Useful Life Language

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Hello,

My name is Casey and I am a consultant at Montrose Environmental, working out of the Santa Ana office. I was working through the ACF Final Regulation Orders and had a question about the minimum useful life. The written definition reads as follows:

“Minimum useful life” means the minimum time period a vehicle may remain in the California fleet. It is the later of the dates specified in subsection (A) or (B) below, as modified by subsection (C):

- (A) Thirteen years commencing from the model year that the engine and emissions control system in a vehicle was first certified for use by CARB or United States Environmental Protection Agency (U.S. EPA); or
- (B) The date that the vehicle exceeded 800,000 vehicle miles traveled or 18 years from the model year that the engine and emissions control system of that vehicle was first certified for use by CARB or U.S. EPA (whichever is earlier)

Based on my understanding, it seems like all vehicles would be required to retire after reaching 800,000 miles or 18 years from the certification. That said, I am unsure when this 13-year useful life will come into play – can you clarify when (A) will be applicable?

Best regards,

Casey Cheng (*he/him*)
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