



April 14, 2021

Dorothy Fibiger, Ph.D.
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Via e-electronic submission: www.arb.ca.gov

RE: CETA Comment to the California Air Resources Board's Notice of Public Availability of Additional Documents and Information for the Proposed Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (15-Days Changes).

Dear Ms. Fibiger,

The Cleaning Equipment Trade Association (CETA) respectfully submits the following comment regarding the California Air Resources Board's (CARB) Notice of Public Availability of Additional Documents and Information for the Proposed Amendments to the Small Off-Road Engine Regulations: Transition to Zero Emissions (15-Days Changes).

CETA is an international non-profit trade association made up of suppliers, manufacturers, distributors, cleaning contractors/end users, and associates. All these members coordinate efforts to promote public awareness, professionalism, industry-wide safety standards, and education for the advancement of the powered cleaning equipment industry. Environmental regulations and lobby efforts are not inside CETA's regular scope of work, but we strive to educate our members to promote best practices across the industry.

The last paragraph of Resolution 21-18 from December 9, 2021, states "Be it further resolved that the Board directs CARB staff to review annually the status of the implementation of the proposed amendments and to conduct a technological review in the 2025 to 2026 timeframe to assess the progress towards the MY 2028 zero-emission standards for portable generators and any other engine equipment category that may be newly subject to the MY 2028 zero-emission standards." and the amendments now indicate "Generator Engines and > 225 cc Pressure Washer Engines" fall under the same requirements for MY 2024 to MY 2028. We look forward to working with CARB staff annually in 2025 to 2026 on progress towards MY 2028 zero-emission standards.

In researching the Preempt Off-Road list where "Cleaners: high pressure" has been removed to avoid confusion with pressure washers as ARB's interpretation that pressure washers have never been considered preempt equipment. The ANSI/UL industry safety standards are titled "High-Pressure Cleaning Machines" which include many types of equipment classes including pressure washers as well as power washers. We kindly request that



“Cleaners: high pressure” be added back to the Preempt Off-Road list as it is the proper description for commercial/industrial equipment.

CETA respectfully requests that CARB SORE staff continue to work with stakeholders towards a proposal of mutual benefit and looks forward to a partnership resulting in a cleaner tomorrow.

Sincerely,

A handwritten signature in black ink that reads 'Jimmy Welch'.

Jimmy Welch
2021-2022 CETA Technical and Standards Committee Chairman



<https://ceta.org>

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