



Associates Environmental

Associates Environmental Announces DRIVE Off-Road Services

In a Regulatory Advisory fittingly released on Friday September 13, 2013, California Air Resources Board (CARB) announced that the United States Environmental Protection Agency (USEPA) has granted authorization to enforce all provisions of the In-Use Off-Road Diesel Regulation (Off-Road Regulation). Up until now only the reporting, labeling, sales disclosure and idling limitations of the Off-Road Regulation have been enforced. The authorization CARB received from USEPA allows CARB to begin enforcing bans on adding Tier 0 and Tier 1 engines as well as the emission reduction provisions of the Off-Road Regulation.

As CARB marches towards enforcing all provisions of the Off-Road Regulation, Associates Environmental is introducing its Diesel Regulations for In-use Vehicles and Equipment (DRIVE) services specifically tailored to assist your fleet's drive towards compliance. A sample Scope of Work for our DRIVE Off-Road services is presented below.

1. In conjunction with your company's Fleet Manager, Associates Environmental (AE) will accumulate all of the information required to prepare our DRIVE Off-Road Service. AE will submit the required information on any additional vehicle purchases, vehicle sales and vehicle retrofits not already submitted to CARB through CARB's Diesel Off-Road On-Line Reporting System (DOORS). AE can provide a data gathering spreadsheet to summarize the information required, or an existing spreadsheet or other information can be provided to AE. If needed, we will come to your facility to assist with gathering the required information. AE will obtain an Equipment Identification Number (EIN) from CARB for each new piece of equipment. If desired, AE will also obtain the two EIN stickers (at a per sticker cost) for each vehicle. AE will work with your Fleet Manager to set a schedule to perform the DRIVE Off-road Service that most benefits the operation, planning, and equipment budget cycle of your company.
2. The DRIVE Off-road Service includes the following:
 - a. Determination if "Delayed Requirements for Early Compliance" is eligible. Qualifying for "Delayed Requirements for Early Compliance" exempts the fleet from the July 1, 2014 compliance requirements. Credit for early compliance actions including reducing fleet horsepower, early retrofits, replacements and repowers, will be calculated and presented for compliance if data gathered can support this task.
 - b. Determination if vehicles are eligible for Special Provisions, Compliance Extensions and Exemptions (Includes permanent or year by year low-use, awaiting sale and equipment manufacturer delays).
 - c. Our enhanced proprietary DRIVE Off-road compliance calculator will provide:
 - i. Determination of the current fleet average index.
 - ii. The fleet average target will be determined and compared to the fleet average index (actual fleet makeup).
 - iii. A ranking, by impact to the fleet average in weighted grams per hour, of your equipment will be provided. The purpose of this ranking is to identify the equipment making the largest contribution to the fleet average so they can be targeted for compliance actions. Equipment with large contributions to the NOx fleet average are also often good candidates for incentive funding.
 - d. If needed for compliance, recommendations for equipment to replace, repower or retire will be presented for each year.
 - e. A year-by-year strategic "road map" which will indicate the compliance strategy best suited to your fleet.



- f. A summary of future compliance dates and important program benchmarks will be presented covering the next two compliance years.
 - g. Any equipment currently under contract for incentive funding will be isolated and provided in a list with the date when the contracts are complete.
 - h. A report will be prepared summarizing the compliance strategy for each year and documenting key rule requirements.
3. The DRIVE Off-road Service Report will be presented in draft form for your review and comment.
 4. After you have reviewed the draft DRIVE Off-road Service Report we will arrange a conference call or site visit to go over the report and to review any changes you would like to make.
 5. Changes based upon your feedback, if any, will be incorporated into the DRIVE Off-road Service Report. A final report will be prepared and transmitted to you for your use.
 6. Associates Environmental will complete the Annual Reporting requirements and prepare the responsible Affirmation of Reporting.
 7. An annual site visit is included with one year of DRIVE Off-road Services. Additional site visits can be quoted on a case-by-case basis considering your location and the number of Associates you would like to attend the meeting.
 8. Call us any time you are considering acquiring a piece of equipment, repowering a piece of equipment, disposing of equipment, adding VDECS or applying for turnover incentive funding so we can help you make decisions that are most beneficial to your fleet.

You may spot other companies floundering on the roadside struggling to keep pace with the Off-road Regulation. Others may be stopped in their tracks by CARB enforcement. Sadder still, some will drive right out of California or be driven out of business entirely.

Associates Environmental will provide the guidance you need to remove the impediments in the regulatory road. Our goal is for your company to cruise in the fast lane toward success. So go ahead, take the keys, buckle your seat belt, start your engine, grab the steering wheel and DRIVE!

If you would like to learn more about the Off-Road Regulation or Associates Environmental's DRIVE Off-road Services please contact one of the following Associates. We will be happy to explain what you need to do to be prepared for enforcement of the Off-Road Regulation.

Mike Buckantz
(714) 625-7020
mbuck@associatesenvironmental.com

Drew Delaney
(949) 322-3739
ddelaney@associatesenvironmental.com

Ricardo Flores
(562) 652-4727
rflores@associatesenvironmental.com