



ASCIP *RISK ALERT!*

Date: March 3, 2009

Attention: ASCIP Members

Subject: Off Road Large Spark-Ignition (LSI) Requirements

In May of 2006, the California Air Resources Board (CARB) enacted regulations that would amend Title 13, Division 3, Chapter 9, Article 4.5 as they relate to off-road large spark-ignition (LSI) engines. These new regulations were to become effective on January 1st, 2009, but due to failed outreach efforts, the date has been postponed until April 1st, 2009. These new regulations are designed to reduce harmful emissions of hydrocarbons and oxides of nitrogen produced by off-road large spark-ignition (LSI) engine fleets. LSI equipment includes: forklifts, sweepers/scrubbers, industrial tow tractors, and some other specified non-forklift equipment which produces 25 or more horsepower (19 kilowatts).

These new LSI regulations impose measuring and recordkeeping requirements on owners of four (4) or more forklifts OR four (4) or more pieces of non-forklift LSI equipment. Specified diesel-powered forklifts may be exempt for the purposes of determining a district's fleet size. Rented and leased LSI equipment must be included in the determination of fleet size if the equipment represents more than twenty (20) percent of the fleet. Additionally, exemptions exist for single LSI equipment that is operated less than 250 hours per calendar year.

Once fleet size has been determined, districts are required to determine their emission levels. Regulation of hydrocarbons and oxides of nitrogen emissions for LSI engines began in 2002 and set a 3.0 grams/braking horsepower-hour (g/bhp-hr) standard level of acceptability. This standard has become progressively more stringent, with the current level being set at 2.0g/bph-hr or less. In January 2010, the new standard will become 0.6g/bph-hr. Districts planning to purchase new LSI equipment should take measures to ensure that the new LSI equipment will be in compliance with the new standard. Retrofit devices may be an approved emission control method under the new LSI regulations.

ASCIP recommends that education agencies review their existing LSI fleets. Educational agencies should consider replacing or phasing out older non-compliant equipment. In addition, driving/fleet policies should be revised to limit non-essential operation of LSI equipment assist in the reduction of emissions.

Information on Frequently Asked Questions are available at the California Air Resource Board website at http://www.arb.ca.gov/msprog/offroad/orspark/documents/faq7_08.pdf

All ASCIP members are encouraged to become familiar with these requirements and take steps to address such concerns as soon as possible. ASCIP staff are available to address any concerns as they may arise.