Frequently Asked Questions

Regulation for In-Use Off-Road

Diesel-Fueled Fleets (Off-Road Regulation)

Compliance Snapshot in DOORS

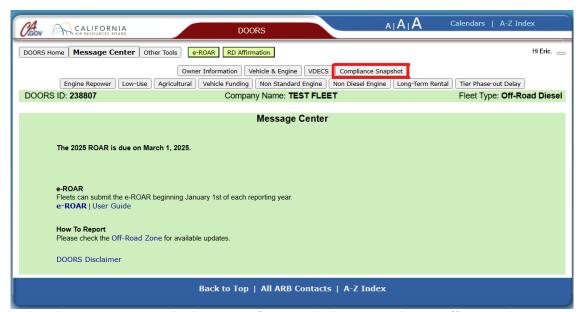
June 2025

Q - What is the DOORS Compliance Snapshot?

A – The DOORS Compliance Snapshot is a page available to each DOORS fleet, in their DOORS account, that shows where the fleet stands in regards to the next compliance date, upcoming performance requirements (e.g., fleet average targets and Best Available Control Technology or BACT requirements), and any BACT credits that have been earned. The information contained in the Compliance Snapshot is based on the information reported by the fleet in DOORS once the snapshot is accessed. The Compliance Snapshot does all Off-Road Diesel Regulation compliance-related calculations for the fleet, including determining the fleet's total max horsepower (hp), fleet average targets, fleet average index, required BACT amounts, and BACT credits.

Q - How do I access my fleet's Compliance Snapshot?

A – After logging into your DOORS account, select the fleet you wish to view, and then select the Compliance Snapshot button at the top of the page, as shown below:



Q – What information does the Compliance Snapshot provide?

- A The Compliance Snapshot contains several sections, each of which are described and illustrated below:
 - Opening summary paragraph and Current Fleet Statistics table;
 - Fleet Target and Average Emission Rates table;
 - Requirements table;
 - Compliance Summary table; and
 - Credit Summary table.

Opening Summary Paragraph and Current Fleet Statistics Table

The top of the Compliance Snapshot page provides the fleet's current compliance status and the next required compliance date, followed by a summary of current fleet statistics, including fleet size, number of vehicles (and number of vehicles that are designated as low-use or exempt from the regulation's performance requirements, as well as number of vehicles that are certified to a different standard or are non- diesel), the total hp of vehicles included in the fleet average, total fleet hp, the fleet's first compliance date based on fleet size and the fleet's next required compliance date.

Fleet Compliance Snapshot

As of Today (April 17, 2025) V Refresh Fleet Data

Your fleet, as currently reported, has met the off-road regulation performance requirements through the January 1, 2025 compliance date because it has earned BACT credits that will be applied towards the required BACT amounts through the January 1, 2025 compliance date. Per regulation section 2449.1, you will need to take action prior to December 31, 2025 in order for your fleet to be in compliance on January 1, 2026.

See the Compliance Summary table below for details.

The Tier Phase Out and Renewable Diesel requirements may also apply to your fleet.

"This determination is based on the make up of your CURRENT fleet in DOORS, which includes age and horsepower of engines, retrofits (if any), vehicles sold (credits, if any), exempt vehicles such as Low-Use (if any), subfleets (if any), and other credits (if any).

| Current Fleet Statistics | | | | | | | |
|---|------------------|--|--|--|--|--|--|
| Fleet Size: | Small | | | | | | |
| Number of Vehicles: In Fleet Average: Low-Use: Exempt Not Low-Use: Vehicles in Funding Contracts: | 5 1 0 0 | | | | | | |
| Vehicles in Fleet: | 6 | | | | | | |
| Horsepower (in fleet average): | 1,025 | | | | | | |
| Total Fleet Horsepower: | 1,175 | | | | | | |
| First Compliance Date: | January 1, 2019 | | | | | | |
| Next Required Compliance Date: | January 1, 2026 | | | | | | |

^{***} Total family horsepower is the sum of the horsepower of any parent company, subsidiary, or other fleet related to the current fleet. Click the "Show Fleet Family" option button on the reporting home page for more information.

Fleet Target and Average Emission Rates Table

The Compliance Snapshot provides an average of the fleet's current emissions (fleet average) in grams per brake horsepower-hour (g/bhp-hr) and fleet average targets for the first required compliance date (based on fleet size) and subsequent years, as shown below. The fleet averages and targets are for oxides of nitrogen (NOx) emissions and are based on the current vehicle and engine information the fleet has reported into DOORS.

| Fleet Target and Average Emission Rates (g/bhp-hr) | | | | | | | | | | |
|--|------|------|------|------|------|------|------|------|------|------|
| January 1, Year | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 |
| Target | 6.2 | 5.8 | 5.3 | 4.6 | 4.0 | 3.5 | 2.8 | 2.2 | 1.7 | 1.5 |
| Average | 6.4 | 6.4 | 6.4 | 4.1 | 3.8 | 3.0 | 2.2 | 2.2 | 2.2 | 2.2 |

Beyond 2028, Fleet Target Rates will no longer decrease each year, but will still be recalculated using the **final year target values** to account for changes in fleet composition.

Requirements Table

The Requirements table again shows the current fleet average as well as the following: the compliance year through which the credits can be used to meet the BACT requirements; the amount of BACT credits remaining (that will carry over to the following year); the required BACT amount for the next required compliance date (which can be met in lieu of meeting the fleet average target; and the next required BACT amount for that following year).

In the example "Requirements" table shown below, the fleet has a current fleet average of 5.9 g/bhp-hr. It has enough credit to meet the January 1, 2025 compliance date requirements and still has 33 hp BACT credits remaining.

The fleet will need the difference between the 102 hp BACT credits required for the January 1, 2026 compliance date and the 33 hp BACT credits carried over. This would result in the fleet needing 69 hp BACT credits to be compliant for January 1, 2026 compliance date.

| Requirements | | | | | | | |
|--|---|--|--|--|--|--|--|
| Your Current Fleet Average: | 5.9 | | | | | | |
| By using your credit, your fleet can comply through: | 2025 | | | | | | |
| in which case your unused credit would be: | 33 hp | | | | | | |
| Required BACT for January 1, 2026: | 102 hp (10% * of fleet hp at the end of 2024) | | | | | | |

To be in compliance each year, the fleet average must be lower than or equal to the fleet target, OR the fleet must meet the required BACT amount. For more information, please see the FAQs on Fleet Average and BACT.

As seen in the table above, BACT credit related rows will show if BACT credits are utilized to be compliant. However, if the fleet is in compliance with the emission target, the table will not show BACT credit rows and will only show "Your Current Fleet Average":

| Requirements | | | | | |
|-----------------------------|-----|--|--|--|--|
| Your Current Fleet Average: | 1.9 | | | | |

To be in compliance each year, the fleet average must be lower than or equal to the fleet target, OR the fleet must meet the required BACT amount. For more information, please see the FAQs on Fleet Average and BACT.

Compliance Summary Table

The Compliance Summary table summarizes how compliance has been or can be met based on the current fleet average and existing BACT credits. In the example below, the fleet has enough credit to meet the January 1, 2025 compliance date requirements with 380 hp BACT credit remaining.

а

| Compliance Summary | | | | | | | | | | |
|-----------------------|--|--------------------|------------|----------------|-------------------|-------------------|--|--|--|--|
| Compliance Date | Begin Credit | Credit Use/Expired | End Credit | In Compliance? | Compliance Method | BACT Requirement | | | | |
| 2019-01-01 | 0 | 0 | 0 | no | Action Needed | 10% * 1,175 = 117 | | | | |
| 2020-01-01 | 0 | 0 | 0 | no | Action Needed | 10% * 1,175 = 117 | | | | |
| 2021-01-01 | 0 | 0 | 0 | no | no Action Needed | | | | | |
| 2022-01-01 | 0 | 0 | 0 | yes | met fleet average | na | | | | |
| 2023-01-01 | 150 | 0 | 150 | yes | met fleet average | na | | | | |
| 2024-01-01 | 225 | 0 | 225 | yes | met fleet average | na | | | | |
| 2025-01-01 | 525 | 145 | 380 | yes | Credit Used | 10% * 1,450 = 145 | | | | |
| 2026-01-01 | 380 | 115 | 265 | yes | Credit Used | 10% * 1,150 = 115 | | | | |
| 2027-01-01 | 265 | 115 | 150 | yes | Credit Used | 10% * 1,150 = 115 | | | | |
| 2028-01-01* | 150 | 115 | 35 | yes | Credit Used | 10% * 1,150 = 115 | | | | |
| All existing BACT cre | All existing BACT credits expire after the 1/1/2028 compliance date. | | | | | | | | | |

Credit Summary Table

The Credit Summary table (below) shows each BACT credit that is available in the Off-Road Regulation through turnover and/or installing a verified diesel emission control strategy (VDECS), and the corresponding amount of credit the fleet has earned. The table displays each credit type referenced in the regulation so the fleet can click on the reference to view the relevant regulatory text. This table can be accessed at the bottom on the compliance snapshot under the link, "Snapshot Calculation Detail".

| BACT Credit Summary | | | | | | |
|------------------------------------|--|--------|--|--|--|--|
| Credit As Of 2025-01-01 | | | | | | |
| Regulation Section 2449.1(b) | Credit Type | | | | | |
| (13) | Early Repowers/Rebuilds | 0 | | | | |
| (14) | Early Replacement | 0 | | | | |
| (15) | Early VDECS Double Credit - Highest level PM VDECS credit - NOx + Not highest level PM VDECS credit - NOx + Highest level PM VDECS credit | 0 | | | | |
| (16) | Early Reduced Fleet HP (only to be used after 2014) | 0 | | | | |
| (17) | 2010-2011 Reduced Fleet HP | 0 | | | | |
| (18) | Interim Replacement/Retirement | 0 | | | | |
| (10)(A) | Turnover - Beginning on January 1, 2018 (must meet Order of BACT Requirements) - Retirement - Permanent Low-Use - Repower / Rebuild (higher tier) | 525 | | | | |
| (10)(B)-(D) | VDECS- Beginning on January 1, 2018 - Highest level PM VDECS credit - NOx + Not highest level PM VDECS credit - NOx + Highest level PM VDECS credit | 0 | | | | |
| (11) | Excess PM VDECS credit used for compliance with the off-road and the truck and bus regulations - Credit From Truck and Bus = 0 HP - Credit Given to Truck and Bus = 0 HP | 0 | | | | |
| Public Funded Vehicles | VDECS Credit - Publicly-Funded Retrofits - Highest level PM VDECS credit - NOx + Not highest level PM VDECS credit - NOx + Highest level PM VDECS credit | 0 | | | | |
| | Total Credits | 525 HP | | | | |

Clicking each credit provision, or clicking the "Show Credit Details" button, will display the vehicles associated with the credit (if applicable) and the calculation for the credit, as shown below for the example above (Permanent Low-Use).

| Permanent Low-Use | | | | | | | | | | |
|-----------------------|--------|----------|--------------------|--------------|------------------|--------------------------|------------------------------|----------------|-----|--------|
| DOORS ID | EIN | Owner ID | Vehicle Type | Manufacturer | Vehicle Model | Vehicle Model Year | Low-Use Effective Year | Engine Tier | HP | Credit |
| 264813 | CM7R78 | r6 | Excavators | CATERPILLAR | model6 | 1996 | 2022 | T0 | 150 | 150 |
| 264813 | RX7U56 | r2 | Excavators | CATERPILLAR | model2 | 1996 | 2024 | T1 | 300 | 300 |
| 264813 | WY3C47 | r5 | Skid Steer Loaders | CATERPILLAR | model5 | 1996 | 2023 | T0 | 75 | 75 |
| Total Turnover Credit | | | | | | | | | 525 | |

Q – If I report a change to my fleet in DOORS, how long will it take to be reflected in the Compliance Snapshot?

- A Changes made to a DOORS fleet are effective immediately. Once a vehicle or engine is added, sold or retired, repowered, or edits have been made to an existing engine model year or hp, the fleet can then go back to their DOORS home page, click to enter the Compliance Snapshot, and immediately see the results of those changes.
- Q I have several fleets that are linked together by one parent fleet; are the calculations in each of my fleets' Compliance Snapshots based on the individual fleet?
- A The overall fleet size calculation includes the total hp of eligible vehicles¹ in all of the fleets that are under common ownership or control and linked to the same parent in DOORS².

Example: Fleet P is a parent fleet with three child fleets: Fleet A (2,000 hp), Fleet B (2,000 hp), and Fleet C (1,500 hp). The Compliance Snapshot for each of the fleets will show that they are each large, based on the parent fleet (Fleet P). However, the calculations for fleet average, BACT requirements, and BACT credits are based on each individual fleet (fleet portion).

For example, Fleet A's fleet average index, fleet average target, and BACT requirement will be calculated based on the vehicles that exist only in Fleet A, and the credits will be calculated based only on the actions taken within Fleet A.

¹ Eligible vehicles mean those that are not exempt from performance standard requirements. Vehicles exempt from performance standard requirements include those designated in DOORS as low-use, dedicated snow removal, 51% to 99% agricultural, emergency-only, or electric).

² Captive attainment area fleets or fleet portions are subject to the small fleet requirements regardless of overall fleet size. This will be reflected in the Compliance Snapshot for such fleets.

For additional information on fleet portions and how they report and comply, please see our Fleet Portions frequently asked questions (FAQ) document, which is available under "Regulation FAQ's" in the Off-Road Zone at https://arb.ca.gov/offroadzone.

Q - My fleet has earned BACT credits; how do I use them?

A – A fleet does not need to take any action to use BACT credits. If the fleet does not meet the fleet average target for the next compliance date, existing BACT credits will automatically be applied to the fleet's BACT requirements. If the fleet takes additional actions, such as additional vehicle or engine turnover or VDECS installations, any credits resulting from those actions will be added to the fleet's existing BACT credit total. Only the amount of BACT credits needed to meet the BACT requirements for the compliance date will be deducted from the fleet's BACT credit total, and any remaining credits will then be carried over to the subsequent compliance date.

Q – My Compliance Snapshot is showing that my fleet average is 0 (zero), even though I have reported vehicles. Is this a mistake?

A – This usually means the fleet has reported an electric or alternative fuel vehicle, and likely needs to report additional information in DOORS. Please see our "Emission Factors FAQ" which is available in the Off-Road Zone at https://arb.ca.gov/offroadzone and/or contact the DOORS hotline at 877-59DOORS (877-593-6677), or by email at doors@arb.ca.gov, for assistance.

Q - How is my BACT requirement calculated?

A – The BACT requirement is calculated based on the fleet's total max hp of eligible vehicles³ at the end of the calendar year (December 31) preceding the last annual reporting date (March 1). For example, the BACT requirement for the large fleet January 1, 2025 compliance date is based on the fleet's total max hp on December 31, 2023, multiplied by 10%.

³ Electric vehicles must meet specific criteria in order to be reported in DOORS and allowed to be included in the fleet average for compliance with the Off-Road Regulation, as explained in the Emission Factors FAQ at http://www.arb.ca.gov/msprog/ordiesel/documents/emissionfactorsfaq.pdf. While this document is intended to assist fleets with their compliance efforts, it does not alter or modify the terms of any CARB regulation, is not a substitute for reading the regulation, nor does it constitute legal advice. It is the sole responsibility of fleets to ensure compliance with the Regulation for In-Use Off-Road Diesel-Fueled Fleets.