CALIFORNIA
AIR RESOURCES BOARD

Zero-Emission Forklift Regulation: Low-Use Exemption Large Spark Ignition Forklift

The Zero Emission Forklift (ZEF) Regulation has not received authorization from United States Environmental Protection Agency pursuant to section 209(e)(2)(A) of the Clean Air Act. Currently the regulation is not being enforced against privately owned or federal fleets in California. It is only being enforced against State and Local Government fleets.

This guide summarizes the requirements for an applicable state or local government fleet to qualify for a low use exemption under (ZEF), Title 13, California Code of Regulations 3007. The low-use exemption will allow qualifying fleet operators to continue to operate a Large Spark Ignition (LSI) forklift which would otherwise not comply with the ZEF Regulation. This guide does not expand, alter, or replace any regulatory requirement. In the event of any inconsistency between this guide and the ZEF regulation text, the regulation text controls.

How does the Low-Use Exemption Work?

From 2028 to 2038, fleet operators will be required to phase out existing LSI forklifts. Phase out requirements are based on fleet size. Large fleets are defined as those with 26 or more forklifts. Small fleets are defined as those with 25 or fewer forklifts. Fleet size is determined by the total number of Class IV, Class V, and zero emissions forklifts in the fleet. Phase-out requirements will apply to forklifts according to model year & fleet size. Please refer to the Section 3006 (d) Tables 1 through 3 for information when to phase out:
https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2024/zeforklifts/froa1.pdf#page=25

Instead of phasing out an LSI forklift, the low-use exemption allows a fleet to operate those forklifts if they operate less than 200 hours per calendar year. Forklifts designated as low-use must be labeled with an Equipment Identification Number (EIN) following labeling requirements under section 3010 of the Zero-Emissions Forklift regulation. If ownership of the fleet is transferred, the 200-hour low-use limit **does not reset**. Please see the link below for more information on the low-use exemption.

https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2024/zeforklifts/froa1.pdf#page=31

LSI forklifts designated as low-use must be completely removed from their fleet by December 31, 2030.

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Initial and Annual Reporting for Low-Use LSI Forklifts

To qualify for the Low-Use Exemption, fleets must comply with the initial and annual reporting requirements. Reporting is done in the DOORS system. *https://ssl.arb.ca.gov/ssldoors/doors_reporting/doors_login.html*

- **Initial Reporting** for each low-use LSI forklift includes:
  - Forklift Information
  - Primary operating location address
  - Hour-meter reading gathered within 30 days of January 1 of the first year the forklift will be designated as low-use
  - Date of hour-meter reading
- **Annual Reporting** for each low-use LSI forklift includes:
  - Hour-meter reading for December 31 of the previous calendar year
  - Date of hour-meter reading
  - Total hours of operation for previous calendar year
  - Reporting between January 1 and April 30

Monitoring Hours of Use

Low-use designated forklift operators must take a date-stamped photograph of the hour meter each time an hour-meter reading is gathered for reporting. If the Fleet Operator does not have access to a camera, they must keep a log with:

- EIN
- Hour-Meter Reading
- Signature of person gathering the reading
- Date from the day that the hour-meter reading was gathered for reporting
- These photographs or logged hour-meter readings must be kept for five years and made available to CARB staff upon request