Air Resources Board



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December 15, 2009

Mail-Out #MSC 09-44

TO: ALL INTERESTED PARTIES

SUBJECT: EXCLUSION OF GASOLINE-FUELED AIRPORT GROUND SUPPORT

EQUIPMENT FROM THE LARGE SPARK IGNITION (LSI) ENGINE

FLEET AVERAGE REQUIREMENTS

The LSI Regulation provides that operators of airport ground support equipment (GSE) may exclude certain equipment from calculations to determine compliance with the fleet average emission level (FAEL) standards contained in Section 2775.1(a) Table 2 of the LSI Regulation. This advisory provides additional guidance to GSE operators regarding when they may exclude certain pieces of GSE from those calculations.

The Air Resources Board (ARB) anticipated that GSE operators might have difficulty obtaining retrofit emission control systems (retrofit kits) for gasoline-fueled LSI engines in a timely manner and added provisions to the LSI Regulation to address cases where either the Executive Officer of the ARB had not verified a retrofit kit, or the retrofit kit was not commercially available for a particular engine and equipment combination. Specifically, section 2775.2(e)(2)(A) (Compliance Extension Based on No Verified or Commercially Available Retrofit Emission Control Systems for Airport Ground Support Equipment) provides that GSE of model year 1990 or newer with uncontrolled LSI engines for which there are no verified retrofit kits as of January 1, 2007, or for which such systems are not commercially available by that date shall be excluded from LSI FAEL standards compliance calculations until January 1, 2011. It further provides that the same GSE shall be excluded from FAEL standards compliance calculations until January 1, 2013 if there are still no verified retrofit kits by January 1, 2009, or the kits are not commercially available by that date.

Retrofit kits are an important tool for achieving compliance with the FAEL standards. Kit manufacturers began marketing kits for propane-fueled LSI engines in early 2007, but did not market kits designed for gasoline-fueled LSI engines prior to January 1, 2009. This lack of availability of retrofit kits for gasoline-fueled LSI engines has been, and still remains, an issue for GSE operators.

In December 2008, the ARB released LSI Program Advisory 08-02. It allowed GSE operators to exclude gasoline-fueled pieces of GSE from FAEL standards compliance calculations until January 1, 2011 because appropriate retrofit kits had not been verified by January 1, 2007. Via this advisory, GSE operators may continue to exclude their

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gasoline-fueled pieces of GSE from FAEL standards compliance calculations until January 1, 2013. After that date, all uncontrolled GSE must be included in calculations performed to determine compliance with the January 1, 2013, FAEL standard.

If you have any questions regarding this advisory, please contact Mr. Mark Williams, Air Pollution Specialist, at (916) 327-5610 or via email at mwilliam@arb.ca.gov, or Ms. Elise Keddie, Manager, at (916) 323-8974 or via email at ekeddie@arb.ca.gov.

Sincerely,

/s/

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cc: Elise Keddie, Manager ZEV Implementation Section

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