



Air Resources Board



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Edmund G. Brown Jr.
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June 15, 2011

Mail-Out #MSC 11-20

TO: ALL INTERESTED PARTIES

SUBJECT: EXCLUSION OF GREATER THAN THREE LITER DISPLACEMENT
LARGE SPARK IGNITION (LSI) ENGINE EQUIPMENT FROM THE LSI
FLEET AVERAGE CALCULATIONS UNTIL APRIL 16, 2012

On April 8, 2010, the Air Resources Board (ARB or Board) issued Mail-Out #MSC 10-15. The mail-out allowed operators of LSI engine-powered equipment fleets to exclude equipment with greater than three liter displacement (> 3L) engines from calculations performed to determine compliance with the LSI fleet average emission level (FAEL) standards contained in title 13, section 2775.1(a) Table 2, California Code of Regulations, until April 16, 2011. This mail-out extends the Engine Displacement provisions of Mail-Out #MSC 10-15 until April 16, 2012.

Mail-Out #MSC 10-15 provided relief to fleet operators with uncontrolled > 3L LSI engine equipment. The lack of clean retrofit emission control system (retrofit kit) choices meant that these operators would only be able to meet the 2009 and 2011 FAEL standards through costly equipment replacement.

The exclusion provided for by Mail-Out #MSC 10-15 ended on April 16, 2011. While original equipment manufacturers began marketing > 3L LSI engine equipment certified to the 2010 hydrocarbon and oxides of nitrogen standard of 0.6 gram per brake horsepower-hour in January of 2010, retrofit kit manufacturers do not expect to make a system with a verification level on par with what they marketed to operators of three liter and smaller displacement LSI engine fleets for several more months.

ARB believes that retrofit kits are still an important compliance strategy, in part because of their cost effectiveness. Therefore, an extension in compliance, as provided for in the LSI Regulation is warranted. ARB will allow LSI fleet operators to exclude their uncontrolled > 3L LSI engine equipment from their fleet average calculations through April 15, 2012. This represents the third and final one-year exclusion that will be afforded to operators of > 3L LSI engine equipment. Commencing April 16, 2012, fleet operator inventories must again include all > 3L

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

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All Interested Parties
June 15, 2011
Page 2

LSI engine equipment in the operator's FAEL standards calculations. To the extent that sufficiently clean retrofit kits are not available by that time, operators will have to achieve the FAEL standard through repower, replacement, or retirement.

Should 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/

Robert H. Cross, Chief
Mobile Source Control Division

cc: Elise Keddie, Manager
ZEV Implementation Section

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