

**Frequently Asked Questions
Regulation for In-Use Off-Road Diesel-Fueled
Fleets (Off-Road Regulation)**

**Unverified Retrofit Devices
Revised May 2011**

Q – Can I get credit for installing a retrofit device that has not yet been verified by CARB?

A – The regulation does not provide any credit for a device until it is verified (except if a fleet is putting on an experimental retrofit to gather data for verification). CARB staff recommends that fleets work with devices that have been verified by CARB and use caution when considering purchase of devices that have not been verified. Verification ensures that devices are effective, durable and warrantied. For further information on CARB’s verification program, see the CARB website at: www.arb.ca.gov/diesel/verdev/verdev.htm

Before any device can be installed, it must receive an aftermarket parts exemption (if a device is verified, the aftermarket parts exemption comes with the verification). An aftermarket parts exemption allows a device (or aftermarket part) to be installed legally on an engine, however this does not mean the device is verified to reduce emissions. An unverified device that does not receive an aftermarket parts exemption may also be subject to additional penalties under the Federal Environmental Protection Agency Non-Road Regulations.

The verification process, which determines the device reduces emissions, is necessary before the device will provide credit toward the regulation for reducing emissions. In short, fleets should ensure the device they install is on the list of verified devices, and does not just have an aftermarket exemption. For further information on the aftermarket parts exemption program, see the CARB website at www.arb.ca.gov/msprog/aftermkt/aftermkt.htm

Q - What happens if the fleet installs a device in the verification process, but the device is not eventually verified?

A - If the device was installed to collect data on the experimental system, and meets the requirements of section 2449(e)(5): Experimental Diesel Emission Control Strategies, the fleet will receive credit. However, if a fleet installs a device not verified at the time of installation that is not part of data collection (Experimental Diesel Emission Control Strategy), the fleet would receive no credit. If a device, which was previously allowed under section 2449(e)(5) will not be verified, credit for the device will no longer be provided.

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.

Q - Can I get double credit if I install such an unverified device?

A- If a fleet installs a device that was not verified at the time of installation but the device later becomes verified, the fleet can receive credit if the device is installed by the applicable deadline. Credit depends on whether a VDECS reduces NOx or PM.

For fleets that install a device that is verified to reduce PM, the fleet will receive double BACT credit (2 times the maximum horsepower of the engine on which the VDECS is installed). For example, a fleet installs a device verified to reduce PM on an engine that is 300 horsepower. The fleet will then receive BACT credit equal to 600 horsepower.

For fleets that install a device that is verified to reduce NOx, the fleet will receive BACT credit in horsepower equal to:

2 times the [(Verified Percent NOx Reduction divided by 120 percent) multiplied by the (Maximum power of the engines on which fleets install VDECS verified to reduce NOx)].

For example, a fleet installs a device verified to reduce NOx on an engine with 300 horsepower. The VDECS is verified to reduce NOx by 50%. The fleet will then receive BACT credit equal to approximately 250 horsepower. The credit was calculated as follows:

$$(50/120) \times 2 = 0.83$$

$$0.83 \times 300 \text{ horsepower} = \text{approximately } 250 \text{ horsepower}$$

To receive credit for a verified device, VDECS must be installed by January 1, 2013 for large fleets, January 1, 2016 for medium fleets, and January 1, 2018 for small fleets.

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