



State of Oregon Department of Environmental Quality

Written Comments

Nov. 6, 2020, Retrofit Compliance 2021 Rulemaking Advisory Committee Meeting

Commenters

Morgan Gratz-Weiser

From: Morgan Gratz-Weiser
Sent: Friday, November 13, 2020 11:41 AM
To: HDDR&R2021
Cc: Jamie Pang
Subject: Diesel Retrofit RAC Comments

Diesel Retrofit RAC Comments
Submitted Nov 13th, 2020

Dear Rick and DEQ team,

Thank you for the opportunity to comment on the diesel engine retrofit draft rules within the Rules Advisory Committee. Oregon Environmental Council's comments are as follows:

340-256-0520 - Certification of Approved Retrofit Technology

Section 1(e) (i) and (ii): - The language as written seems duplicative to have each person submitting an application include a copy of a letter from EPA *and* a copy of the CARB executive order. Is it incumbent on each person to contact CARB and EPA to complete this process, or might DEQ keep these materials on file to check if each requested retrofit technology is in compliance? Perhaps these documents could be posted to DEQs website, and persons should be guided to check that their technology is on the list prior to installation. This will help the agencies operate more efficiently and also limit the burden on regulated fleets.

340-256-0540 - Periodic Verification Process

Oregon Environmental Council believes it is critical to the success of this program to have regular retrofit inspections to ensure compliance. We agree with the required testing requirements, and agree with other commenters that a two-year verification cycle would be most efficient, in line with the light-duty Vehicle Inspection Program. We propose a two-year inspection requirement, with compliance being completed by approved third-party mechanics, and the results submitted to the department to fulfill the retrofit compliance process and periodic verification process. Additional randomized testing by the department could complement and help ensure retrofits are functioning properly. A fine could be assessed for false compliance documents, or

for vehicles operating under a certificate but is found to be out of emissions compliance.

Thank you for your consideration, and we appreciate being part of this rulemaking process. Clear and functional rules will be necessary for the program to operate effectively, and ensure a decrease in diesel particulate emissions.

Morgan Gratz-Weiser (*she/her*)
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