

CALIFORNIA COTTON GINNERS ASSOCIATION

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COMPLIANCE ADVISORY

TO: All Gin Managers

FROM: Casey Creamer
Assistant V.P.

DATE: February 4, 2008

SUBJECT: LSI Forklift Rule

As you are all well aware, the California Air Resources Board (ARB) has adopted a rule requiring the retrofit of propane or gasoline forklifts used at industrial sources, including cotton gins. As we have advised in the past, this affects facilities with 4 or more forklifts. Any forklift that is 1990 and newer must be retrofitted, with 20% required to be in compliance by 2009 and the remaining 80% by 2012. One clarification has been made by the ARB, and that is the older forklifts must be included in the initial count. As an example, if you have four (4) forklifts and three (3) are 1982 and one (1) is 1996, then the 1996 forklift must be retrofitted.

This is a statewide rule, and applicable to all cotton growing and ginning regions in the state. Up to 80% of the forklifts are eligible for funding through your local air district's incentive funding program, but you must act before 2009. Please contact them for application information, or call our office and we can forward the applications to you.

Exemptions –

- Does not cover facilities with 3 or less forklifts
- Does not cover forklifts that are 1989 or older
- Does not cover forklifts that are used 250 hours or less per year

Requirements –

- 20% of covered fleet must be retrofitted by 2009
- 80% of covered fleet must be retrofitted by 2012
- Retrofit Technology must meet 3.0 g Nox/bhphr
- Only two (2) companies meet ARB's verification procedures for 3.0 g Nox/bhphr (Emission Control Systems and Nett Technologies)

Examples

Diesel	Propane or Gasoline		Subject to Rule	Retrofit
	Pre – 1990	1990 or newer		
0	2	0	No	0
2	2	0	No	0
0	2	1	No	0
0	2	2	Yes	2 – 1990 or newer
0	3	1	Yes	1 – 1990 or newer
0	1	3	Yes	3 – 1990 or newer
4	0	0	No	0
4	4	4	Yes	4 – 1990 or newer