

NASSCO Environmental Instruction #10:

Environmental Requirements for Off-Road Equipment at NASSCO

Diesel or large spark ignition (LSI) equipment is considered “off-road” when it is propelled under its own power but is not designed or registered to be driven on public roads. Examples of off-road equipment include, but are not limited to: forklifts, load handlers (carriers and gradalls), rough terrain cranes, manlifts, and construction equipment (graders, bobcats, earth movers). Off-road equipment may be powered by diesel, gasoline, propane, or CNG. Contractors and third parties proposing to bring off-road equipment to NASSCO facilities must be aware of and comply with the environmental requirements applicable to the operation of this equipment. For questions about these or any other NASSCO environmental requirements, call 619-544-7506.

Before You Begin

NASSCO Approval

Your company may not bring off-road equipment (≥ 25 hp) into any NASSCO facility without first applying for and obtaining approval from the Environmental Engineering Department. Separate approval must be obtained for each off-road diesel or LSI fleet (per ship or project name). To apply for approval, submit a completed and signed “***NASSCO Environmental Form #10: Request for Authorization of Off-Road Equipment***” to the NASSCO Environmental Engineering Department at Envreports@nassco.com. You may not operate off-road equipment until approval has been issued by the Environmental Engineering Department.

Registration with California Air Resource Board

Off-road equipment having an engine rated 25 horsepower or greater are subject to either California’s In-Use Off-Road Diesel or Large Spark-Ignition Regulations. The owners of equipment subject to these regulations must register their equipment in the “Diesel Off-Road Online Reporting System” (DOORS) operated by the California Air Resources Board (CARB). Upon registration of your equipment, your company will be assigned a unique fleet identification number and each registered vehicle will be issued its own Equipment Identification Number (EIN). Your company is responsible for registering any equipment subject to these regulations before bringing the equipment onto any NASSCO property. For information on the State of California’s in-use off-road diesel regulation, contact the CARB Diesel Hotline at (866) 634-3735 or visit www.arb.ca.gov.

Certificate of Reported Compliance Submittal Requirement

Each company subject to the In-Use Off-Road Diesel Regulation that has an ongoing contract with NASSCO must obtain a valid Certificate of Reported Compliance from CARB in order to continue doing business with NASSCO. Your company must submit a valid Certificate of Reported Compliance to the NASSCO Environmental Engineering Department at Envreports@nassco.com by May 1st of each year.

Equipment Labeling Requirement

CARB regulations require that off-road diesel equipment be clearly and conspicuously labeled with the CARB-assigned EIN. The EIN must consist of white characters on a red background located in clear view on both sides of the outside of the vehicle, approximately 5 feet above the ground. If the vehicle is not 5 feet tall, the label may be placed lower on the vehicle.

Each character of the EIN needs to be at least 3 inches tall and 1.5 inches wide. Furthermore, the EIN must be maintained in a manner that retains its legibility for the entire life of the vehicle. All diesel equipment subject to this regulation must bear the required labels before entering NASSCO property and at all times while on NASSCO property.



LSI equipment are required to be labeled at least on one side.

Renewable Diesel

The State of California requires fleets to procure and use R99 or R100 renewable diesel. This requirement applies to all off-road diesel equipment unless exempt as specified in 13 CCR § 2449.1(f).

Mandatory Reporting of Noncompliant Contractor Fleets

The State of California requires that NASSCO reports noncompliant vehicles or fleets to CARB. If NASSCO observes fleets without a valid Certificate of Reported Compliance or any noncompliant vehicles subject to this regulation, NASSCO must report the company and fleet information to CARB within 5 days of discovery.

Work Practices

NASSCO contractors and team members are responsible for educating their employees and third party subcontractors on the applicable environmental requirements associated with operation of off-road diesel and LSI engines, including the following:

Anti-Idling Policy

While your in-use off-road diesel equipment is operated at NASSCO, the operator must comply with NASSCO's Anti-Idling Policy, which states that no in-use off-road diesel equipment or diesel vehicle may idle for more than five consecutive minutes. The policy allows exemptions to the idling policy for the following cases:

- When it is necessary to complete a function of the vehicle, such as providing hydraulic power to a crane or fuel pump. Also, if the idling is necessary to perform a secondary function of a vehicle, such as load handling or operation of a pump, it is allowed
- When it is necessary for servicing, testing or maintenance, including idling necessary to regenerate exhaust filters
- When idling is required for safety reasons
- When warming a vehicle up to operating temperatures, as specified by the equipment manufacturer
- When queuing, such as when a line of forklifts forms to offload materials from a truck. Idling for more than 5 minutes is not allowed simply for the purpose of waiting for another vehicle or piece of equipment to perform its function

If your company will be using off-road diesel equipment at NASSCO, you are responsible for training each operator about the anti-idling policy before allowing operation of the equipment.

Pollution Prevention

State and local regulations require that diesel engines and their pollution control devices are operated and maintained in accordance with manufacturer's specifications. The equipment must be kept in good condition to prevent release of excess emissions or leaks and spills. All engines must be operated in conformance with SDAPCD Rule 50, which prohibits visible emissions. If, at any time during the operation of the diesel equipment, there is evidence of an environmental release (fuel spill or leak, crankcase smoke, visible emissions from the exhaust outlet), then the equipment must be immediately shut down until the problem can be resolved.

Spills or Environmental Releases

Spills and releases greater than one quart of hazardous materials, including diesel fuel and oil, must be immediately reported to NASSCO Security 619-544-8401 according to NASSCO's spill reporting policy, as outlined in NASSCO's Best Management Practice #102.