Comment 1 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Timothy
Last Name: Vargo
Email Address: Tim2Tall@MSN.com
Affiliation:

Subject: Control of diesel emissions.
Comment:

```
A great majority of the public, that own personal diesel vechicles,
use them for pleasure and do not care and are ignorant to the toxic
output of emmissions that they are producing.  The Industry and the
controlings boards that govern the emission output, needs to
tightly regulate the misuse of the general populations abuse of
diesel.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-12-07 10:24:37

No Duplicates.

Comment 2 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Jack
Last Name: Goodby
Email Address: goodbygrading@comcast.net
Affiliation: Goodby Grading Inc

Subject: This will bankrupt this company
Comment:

```
Clarity and Comprehensibility: The regulation is too complex and
lengthy: we do not fully understand it or its effect on our fleet.
Before this regulation, we bought equipment based on what we needed
to do our work. We will have to hire consultants to tell us what we
can and must buy and when we will need to replace, retrofit, or
repower what have.
Capital-Intensive Industry: The value of our business is tied up
in our fleet of construction equipment. To meet ARB's requirements
for newer equipment, we will have sell existing equipment.
Rule Forces Downsizing of Capability: Because newer equipment
costs more than our older equipment, ARB's rule will force us to
downsize our operations. Downsizing will limit our ability to
perform on contracts and require us to take longer on the projects
that we win.
Unfair Retroactive Requirements: When we made our purchasing
decisions and other investments, we relied on the standards that
applied to us at the time. It is unfair to require us to retrofit
or replace equipment that was legal when we bought it. ARB should
regulate the manufacturers, not consumers.
Cost Pass-Through: For us to win contracts, we cannot simply pass
on the costs of equipment purchases to our customers. We have to
absorb a significant portion of our own expenses. Increasing our
expenses will overwhelm our narrow profit margin.
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-12-21 18:01:28

No Duplicates.

Comment 3 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Mark
Last Name: Garrison
Email Address: mgcemark@yahoo.com
Affiliation: Construction Business Owner

Subject: Comments on Off Road Equipment Recent Ruling
Comment:

As a small business owner, and employer of 25 people, this ruling while well intended will wreak havoc on our construction industry. In order for this ruling to be effective, the following items need to be addressed and answered prior to the implementation of the laws:

Clarity and Comprehensibility:

The regulation is too complex and lengthy: we do not fully understand it or its effect on our fleet. Before this regulation, we bought equipment based on what we needed to do our work. We will have to hire consultants to tell us what we can and must buy and when we will need to replace, retrofit, or repower what have.

Capital-Intensive Industry:

The value of our business is tied up in our fleet of construction equipment. To meet ARB's requirements for newer equipment, we will have sell existing equipment.
Rule Forces Downsizing of Capability: Because newer equipment costs more than our older equipment, ARB's rule will force us to downsize our operations. Downsizing will limit our ability to perform on contracts and require us to take longer on the projects that we win.

Unfair Retroactive Requirements:

When we made our purchasing decisions and other investments, we relied on the standards that applied to us at the time. It is unfair to require us to retrofit or replace equipment that was legal when we bought it. ARB should regulate the manufacturers, not consumers.

Cost Pass-Through:

For us to win contracts, we cannot simply pass on the costs of equipment purchases to our customers. We have to absorb a significant portion of our own expenses. Increasing our expenses will overwhelm our narrow profit margin.

Cordially,

Mark Garrison
MG Constructors & Engineers Inc.

15650 Vineyard Blvd., Suite A, #232
Morgan Hill, CA 95037

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-12-22 05:53:42

No Duplicates.

Comment 4 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Scott
Last Name: Murphy
Email Address: smurphy2ibinc@live.com
Affiliation:

Subject: ruling on OTR tractor-trailers
Comment:

```
It is the general consensus throughout the trucking industry that
the rulings that are being handed down from CARB to the trucking
industry are too extreme.  It is also a general consensus that
there are 47 other states to perform operations, and said rulings
will cause a majority of the industry to relocate facilities in
other states.  It seems that CARB is going overboard with
unrealistic rulings, given the available technology at this time.
You must keep in mind that there are actual human beings operating
these trucks;  human beings that use these trucks to make a
living, to send their children to college, and to pay the much
needed taxes that the states and government require to operate.
In conclusion, said rulings will cause a severe reduction in
trucking operations within California, along with a reduction of
much needed taxes paid, including a mass migration of businesses
that utilize the trucking industry to move their product.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-12-23 11:55:29

No Duplicates.

Comment 5 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: michael
Last Name: fletcher
Email Address: bobefletcher@yahoo.com
Affiliation:

Subject: Regarding truck emission standards
Comment:

Let me introduce myself,My name is mike and have been around trucks for 20 years. I have a repair facility that deals with caterpillar engine ranging from years 1982 to 2006 and have over 450 customers. I have talked with charles ross and I agree on the action for cleaner air but believe your agency should make rules for each truck per its year. The consumer is not going to be able to afford these 15,000. ad ons .I have worked on a trash company who has the type 3 muffler and compared to a pump I was done working on that had no muffler made no difference in the smoke (PM) I believe smoke testing all trucks whether someone owns one or forty they should smoke test every year. There are owner operators who own one truck and have never been tested since 1990. Those are the polluters, forcing them to make minor maintence would greatly clean up how there trucks burn. Trucks that leave out facility that are 1990-1993 burn at 15% to 20% opacity. Making a truck thats old try to burn as clean as a 2007 is going to have long term trouble. We have allready redone engines with the engine fumes going into the intake set-up that is on the type 1 requirments. Please call if you have questions 661-723-3333

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-12-24 20:35:26

No Duplicates.

Comment 6 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: RON
Last Name: HARDER
Email Address: rlharder@aol.com
Affiliation:

Subject: Amendments to the Verification Procedure, Warranty and In-Use Compliance Requirements for
Comment:

This regulations is unfair due to the following:

Clarity and Comprehensibility: The regulation is too complex and lengthy: we do not fully understand it or its effect on our fleet. Before this regulation, we bought equipment based on what we needed to do our work. We will have to hire consultants to tell us what we can and must buy and when we will need to replace, retrofit, or repower what have.
Capital-Intensive Industry: The value of our business is tied up in our fleet of construction equipment. To meet ARB's requirements for newer equipment, we will have sell existing equipment.
Rule Forces Downsizing of Capability: Because newer equipment costs more than our older equipment, ARB's rule will force us to downsize our operations. Downsizing will limit our ability to perform on contracts and require us to take longer on the projects that we win.
Unfair Retroactive Requirements: When we made our purchasing decisions and other investments, we relied on the standards that applied to us at the time. It is unfair to require us to retrofit or replace equipment that was legal when we bought it. ARB should regulate the manufacturers, not consumers.
Cost Pass-Through: For us to win contracts, we cannot simply pass on the costs of equipment purchases to our customers. We have to absorb a significant portion of our own expenses. Increasing our expenses will overwhelm our narrow profit margin.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-12-25 19:17:02

No Duplicates.

Comment 7 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Kenny
Last Name: Pearcy
Email Address: harleymankp@yahoo.com
Affiliation: owner-operator

Subject: truckers
Comment:

```
I think the people at CARB has already inhaled too much diesel
smoke, what are you thinking on this new law of anti-idling. Did
you every stop and think about how much trucks means to your
state, and how many people that are employed because of trucking.I
can see if you make truckers have APU's but now you say thats not
good enough.What is CARB doing to the railroads,are they going to
have to do the same thing as truckers.I think they leave there
engines run all the time also.Is CARB going to take the rails out
of california too.Well california will not have to worrie about my
truck for it's a 1995 so I won't be comming to your state again.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-12-29 06:24:39

No Duplicates.

Comment 8 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Ron
Last Name: Ringler
Email Address: ronpam.ring1er@gmail.com
Affiliation: Truck driver

Subject: Commercial carriers
Comment:

More restrictive regulation against commercial trucks, interstate and intrastate, will force trucking companies out of business or cause trucks to eliminate California as a delivery destination. Have you thought of truckers pulling into a rest stop or truck stop for his or her sleep time and having to run the engine or APU heater/air conditioner just to stay comfortable to be able to sleep. California can have very cold and hot temperatures. Maybe not just to stay comfortable, but also to survive.
Survival of California and the nation as a whole depends on trucks. Forcing trucks to avoid California will cripple the nation. I am a life long (55 years old) resident of California. I have been driving all kinds of trucks for 17 years so I know of which I speak. These regulations wil cause incredible damage. Please reverse your trend!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-01-01 20:51:26

No Duplicates.

Comment 9 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: RON
Last Name: HARDER
Email Address: rlharder@aol.com
Affiliation: APA

Subject: off-road diesel regulation
Comment:

Dear Members of the California Air Resources Board:

The California Air Resources Board (CARB) adopted a flawed off-road diesel regulation this summer that will have a profound, negative impact on California's infrastructure rebuilding efforts, the health of the state's construction industry and its overall economy.

Construction contractors and workers want these regulations to work for everyone, however this rule lacks clarity, does not take into account the availability of capital in the industry or the advancement of engine technology, will result in a downsizing of construction firms and loss of construction jobs, contains unfair retroactive requirements and does not accurately reflect the economics of our business. More specifically, this regulation is flawed for the following reasons:
Clarity and Comprehensibility: The regulation is too complex and lengthy: we do not fully understand it or its effect on our fleet. Before this regulation, we bought equipment based on what we needed to do our work. We will have to hire consultants to tell us what we can and must buy and when we will need to replace, retrofit, or repower what have.
Capital-Intensive Industry: The value of our business is tied up in our fleet of construction equipment. To meet CARB's requirements for newer equipment, we will have sell existing equipment. This is like a retailer being forced to sell its building a buy a new one.
Availability of Technology: The engines we need to purchase to be in ultimate compliance with this rule do not exist in the market today and won't for at least another six years. Due to this, we will be forced to spend tens of thousands of dollars to retrofit equipment that in less than ten years we will have to turn around an replace.
Rule Forces Downsizing of Capability: Because newer equipment costs more than our older equipment, CARB's rule will force us to downsize our operations. Downsizing will limit our ability to perform on contracts and require us to take longer on the projects that we win. This means the more than $42 billion in infrastructure bonds to rebuild California passed in 2006 will build fewer schools, houses and roads.
Unfair Retroactive Requirements: When we made our purchasing decisions and other investments, we relied on the standards that applied to us at the time. It is unfair to require us to retrofit or replace equipment that was legal when we bought it. With this rule CARB, for the first time, is regulating the consumer of

equipment rather than the manufacturers.
Cost Pass-Through: CARB has suggested that the cost of this regulation will be passed on to our customers. This is unrealistic. For us to win contracts, we cannot simply pass on the costs of equipment purchases to our customers. We have to absorb a significant portion of our own expenses. Increasing our expenses will overwhelm our already narrow profit margin.
I want to be clear: (organization/company name) is very supportive of reducing particulate matter (PM) and NOx emissions from diesel engines. There is no disagreement that we need to work collectively to improve the state's air quality and all of us want to provide as healthy an environment as possible for our employees on our job sites, but we need to make sure we do it in away that keeps the state moving forward and with consideration for both the environment and the economy.

Sincerely,
Ron L. Harder

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-01-08 13:02:30

No Duplicates.

Comment 10 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Eric
Last Name: Peterson
Email Address: napaeric@sbcglobal.net
Affiliation: voter

Subject: Engine Exhaust
Comment:

Hybrid's stop the engine when not in use. This is a technology that could be added to all new engine's in the future. This would be VERY helpful during commuting in stop and go traffic. Cars, trucks and buses as well as stationary, agriculture, off road engines all pollute when running. Idle is the worst pollution since no work is done.

Turbo engines produce more power with less fuel, less fuel means less CO2 production. Diesel turbo engines are the most fuel efficient, therefore they naturally produce less CO2 then gasoline engines. Less use of fuel is the goal, or it should be.

Micro diesel hybrides could reduce our fuel use by more than 40%. We should be encouraging, not discouraging clean diesel.

And keep the engines OFF when they are not doing useful work, no matter where or what that engine is working at.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-01-10 14:38:27

No Duplicates.

Comment 11 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Robert V.
Last Name: Jones
Email Address: bjones2977@verizon.net
Affiliation:

Subject: Diesel Truck Legislation
Comment:

ARB,
I was around when the "SMOG" issues first were controlled by the state. This was and still is a total disaster. If the laws passed affected only the new cars the enormis financial impact of the short sighted laws would not have been near as devistating. I have personally have delt with almost all aspects of the "SMOG" system, and it is totally out of control. The extream financial impact of this legislation will never really be known. From the price increase for ALL goods and services to the manpower increase required to enforce this the amount of money needlessly squandered is totally unacceptable.
It is time for the "SMOG" zelots to realize that their services are required in countries like India and China [2 of the biggest polluters in the world]. The idea that the air in California is to be "Clean" and the rest of the world is of no concern is totally ludicres. This legislation is the latest attempt of the "Clean air zelots" to Tax and spend the people of California with no good outcome. This legislation will NOT affect the NAFTA trucks comming in from outer countries and this is by federal law. This means that unfair advantage is given to everyone Not Americans. Please get your head out of the sand and realize that the good intentions put forward with this legislation will have far reaching effects in the fact it will be expensive beyond all accountibility and discriminating aginst Americans. In closing, it is time for all envolved to get a grip on reality, this legislation will be discriminatory, expensive in all aspects and will have a minimal impact on "SMOG". It just is not worth it!!!
RV Jones

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-01-18 07:33:03

No Duplicates.

Comment 12 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Daniel
Last Name: Prince
Email Address: chc9j@hotmail.com
Affiliation:

Subject: Comment re: strategies to control emissions from diesels
Comment:

```
I am opposed to additional inspection requirements or the
imposition of retrofit devices on my stock(unmodified in any
way)diesel engine. A new verification program equates to
additional and unnecessary costs to me to prove I am compliant
with the law. CARB's mandate would be better-served by stricter
controls (read: prohibitions)on the sale of aftermarket
performance equipment for diesels such as tuners or auxillary
programmers that change stock powertrain operating parameters.
Imposition of new, stricter emissions requirements should not be
retroactive. Currently registered vehicles are not the problem;
attrition alone negates any long-term adverse environmental effect
from privately owned pick-up trucks (including one-ton models)and
diesel powered cars.
"reburning" of used crankcase oil in diesels should be prohibited
as well. Some commercial trucking entities supplement their fuel
with used engine oil. Some engine manufacturers publish guidelines
relating to recommended amounts of oil that can be intoduced to the
fuel supply.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-01-18 19:24:25

No Duplicates.

Comment 13 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Jarrod
Last Name: Kohout
Email Address: jarrod@boshartengineering.com
Affiliation:

Subject: Amendments to Verification Procedure
Comment:

```
Dear Board Members,

I have read through the proposed amendments and believe that
they've been well thought out.  I would like to comment however on
the segment related to the proposed changes to Conditional
Extensions.  I'd like to recommend changing the provisions of the
Conditional Extension so that it works both ways.  It currently
only allows DECS to be conditionally extended from off-road to
on-road.  I'd like to recommend that provisions be drafted so that
DECS can be conditionally extended from on-road to off-road.  I
think conditional extensions are extremely important as a way to
encourage manufacturers to obtain verification for both types of
test cycles.

Please consider the above recommendation.  I'd be happy to further
discuss this issue with you upon your request.

Sincerely,

Jarrod Kohout
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-01-21 11:40:28

No Duplicates.

Comment 14 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Jamie
Last Name: Song
Email Address: jsong@meca.org
Affiliation: MECA

Subject: MECA Testimony on ARB's Proposed Verification Procedure for Diesel Engines
Comment:

```
To Whom it May Concern:

Please find attached a copy of the written testimony submitted by
the Manufacturers of Emission Controls Association (MECA)
regarding the above-referenced rulemaking.

Sincerely,
Jamie Song
```

Attachment: www.arb.ca.gov/lists/verdev2008/18-arb_verification_testimony.zip

Original File Name: ARB Verification Testimony.zip

Date and Time Comment Was Submitted: 2008-01-22 10:37:15

No Duplicates.

Comment 15 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Glenda
Last Name: Rivera
Email Address: glendarchavez@gmail.com
Affiliation:

Subject: Amendments to the Verification Procedure
Comment:

```
Dear Board Members,

I reviewed the proposed amendments and would like to make the
following recommendation: Under the Conditional Extensions, I
recommend changing the provisions of the Conditional Extension so
that it works both ways.  As it currently stands now, it only
allows DECS to be conditionally extended from off-road to on-road.
 I strongly recommend that the provisions be drafted to allow DECS
to be conditionally extended from on-road to off-road, as well.
By implementing this change you will strongly encourage
manufacturers to obtain verification for both types of test
cycles.

I thank you in advance for the opportunity to submit my
recommendation.  Please feel free to contact me should you require
any additional information.

Respectfully,
Glenda Rivera
909-974-8490
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-01-22 10:50:47

No Duplicates.

Comment 16 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Kevin
Last Name: Brown
Email Address: kfb@enginecontrolsystems.com
Affiliation: Engine Control Systems

Subject: Comment on Proposed Verification Procedure, Warranty and In-use Compliance Requirements
Comment:

```
please see our comments in the attachment
```

Attachment: www.arb.ca.gov/lists/verdev2008/20-ecs_comments_on_verification_procedure_ammendments_jan_22_08.pdf

Original File Name: ECS Comments on Verification Procedure Ammendments Jan 22 08.pdf

Date and Time Comment Was Submitted: 2008-01-22 11:55:46

No Duplicates.

Comment 17 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Barry
Last Name: Wallerstein
Email Address: bwallerstein@aqmd.gov
Affiliation:

Subject: Proposed Amendments Disel Emission Control Strategies Verification Procedure Comments
Comment:

```
Please see attached.
```

Attachment: www.arb.ca.gov/lists/verdev2008/21-jamesgoldstene.pdf

Original File Name: JamesGoldstene.pdf

Date and Time Comment Was Submitted: 2008-01-22 13:15:43

No Duplicates.

Comment 18 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Irina
Last Name: Krivoshto
Email Address: ikrivoshto@ucdavis.edu
Affiliation: UC Davis School Of Medicine

Subject: Health effects of diesel exhaust
Comment:

We have published a review article in this month's Journal of the American Board of Family Medicine on the many adverse health effects of diesel exhaust such as heart attacks, high blood pressure, asthma, bronchitis, infertility, brain damage, as well as lung, ovarian, and esophageal cancer.

The article may be of interest to members of the Air Resources Board as it summarizes the up-to-date findings regarding diesel exhaust and public health. I will be present at the meeting to answer any questions and provide copies of the article. It may also be accessed on the internet at this site:

http://www.jabfm.org/cgi/content/full/21/1/55

Abstract: Diesel fuel and the products of its combustion represent one of the toxins most commonly encountered by people living in both urban and rural areas of the world. As nations become more heavily populated, there will be increasing reliance on diesel fuel to power mass transportation and commercial vehicles, as well as heavy machinery involved in construction, farming, and mining. The majority of patients who present to urban primary care clinics and emergency departments will have had significant chronic exposure to diesel exhaust because most use and/or live near busy streets and highways. Furthermore, those who operate or work or live near diesel-powered machinery will have even more toxic exposure. Primary care physicians should be aware of the acute and chronic deleterious clinical effects of diesel exhaust. In this article we review the toxicity and myriad health problems associated with diesel exhaust.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-01-23 08:00:51

No Duplicates.

Comment 19 for Verification Warranty In-Use Compliance (verdev2008) - 45 Day.

First Name: Jerry
Last Name: Ferdun
Email Address: jerry@brockconstruction.com
Affiliation: G & L Brock Construction. Inc

Subject: On-Off Road and PERP PM compliance kills business
Comment:

The cost and scope of these regulations will strangle small businesses and put thousands of California workers out of jobs in an already collapsing economy where jobs are hard enough to get, let alone keep. Because:

1. To force a confiscatory and extreme registration cost to portable diesel powered equipment built in 1997 or older, regardless of horsepower, will remove the machines from service as the state wants but will force small family owned businesses into severe financial hardship in order to comply or worse yet out of business completely.
2. This retroactive regulation/taxation of assets by the CARB upon equipment owned by California businesses is nothing more than extortion. Instead of company owners growing their businesses we are being forced to eliminate good operational equipment and shrink the size of our fleet/company which in turn eliminates more jobs and taxpayers.
3. The details of CARB’s plan to regulate and retroactively tax and control fleets is obviously not well known or understood by the general public. The proof is here, notice the small number of comments posted and the number of attendees to the seminars.
4. Complexity of compliance. The voluminous complexity of the details of how CARB plans to regulate PM is impossible for the lay person to comprehend. If a plan is implemented it MUST be simplified and it MUST be oriented more directly if favor of and structured to the owners of the equipment. After all we are the ones paying for this.
5. Forcing costly regulations and expensive un proven cutting edge PM technology is as if the entire state government was standing in front of all us business owners with a loaded machine gun and an endless supply of ammo and saying comply or close! This plan is essentially killing businesses and families statewide. We all know specialized technology in its infancy is expensive in acquisition, maintenance, training of technicians and repairs. This technology is not exempt from this rule. Manufacturers of the PM reduction technology should be treated just like a drug company and forced to bear the expense of R & D and proving its safe and reliable performance. We contractors should not be the financiers or lab rats to the State or manufacturers. Once the technology is tested, examined and proven reliable we, as the end user can choose to purchase what fits our needs, not what is forced upon us. Until a broad based and reliable PM exhaust retrofit is shown and proven to achieve the Tier 4 or higher desires of the state, there cannot be any forced compliance.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-01-23 09:13:48

No Duplicates.

There are no comments posted to Verification Warranty In-Use Compliance (verdev2008) that were presented during the Board Hearing at this time.

Comment 1 for Verification Warranty In-Use Compliance (verdev2008) - 15-1.

First Name: leo
Last Name: picollo
Email Address: leopicollo@yahoo.com
Affiliation:

Subject: new law for truck immissions
Comment:

hello my name is Leo i have a small company and this law with the exhaust system for the older truck will put me out of business i can,t afford a 85,000 2006 truck i,m barely making it with the economy the way it is , this law now is down right stupid , look everyone wants clean air ok i,m not saying you should not start a law like this but do it with common sense , put this on the ballot in 2015 this will give all the little companies time to react the 2006 truck that come standard with this system will be affordable for companies like mine and at that point we can upgrade ok tell you what you pass this requirement the way you have it and you are going to make a lot of people angry myself i feel there should be a truck strike in Calif all truck for 1 month fuel food garbage interstate you people that are proposing these things are not thinking things out this is lives you're playing with get it common sense legation is all we ask i will be holding 3 truck reallies for a truck strike 1 in San Jose 1 in redding and 1 in Los Angeles the government doesn't realize how important we are so it is over due we show the state we matter and the only way is to stop all trucks for 1 month oh don,t worry everyone has earthquake preparedness kits at home right this will be a good test for the states emergency response systems

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-23 02:40:36

No Duplicates.

Comment 2 for Verification Warranty In-Use Compliance (verdev2008) - 15-1.

First Name: Louise
Last Name: Palmer
Email Address: lpalmer@bak.rr.com
Affiliation: Business Owner

Subject: Proposed Section 2025 Rules/Grants & Incentives
Comment:

I wanted to point out that the proposed Section 2025 hurst small business owners such as myself who are engaged in the business of transporting produce out-of-state. This rule will put the little guys out of business. The little guys are needed to ensure the efficient and economical transport of products to and from California. ALSO in consideration of any grants and incentives, all guidleines I have seen only apply to those who travel 75% or more in CA. Grants and incentives should be offered to all terminal that operate from CA as we are all required to comply witht he rules and regulations. The guidelines do not make any sens because what about a CA diesel truck that operates only 1000 miles within CA, but that 1000 miles constitutes 100% of his operations, as opposed to one such as myself who operates 30,000 miles in CA, but that 30,000 miles only constitues 40% of miles traveled? Do you realize that Greenhouse Gases do not recognize borders? Grants and incentives should be opened up to ALL small business owners who register in CA. Period!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-24 10:00:06

No Duplicates.

Comment 3 for Verification Warranty In-Use Compliance (verdev2008) - 15-1.

First Name: Rasto
Last Name: Brezny
Email Address: rbrezny@meca.org
Affiliation: MECA

Subject: MECA Comments to 15-day Modifications to Verification Procedure
Comment:

```
Please find attached MECA's comments and recommendations to ARB's
proposed 15-day changes to the verification  and in-use compliance
procedures.
```

Attachment: www.arb.ca.gov/lists/verdev2008/28-meca_verification_15-day_final_changes_100108.pdf

Original File Name: MECA Verification 15-day Final Changes 100108.pdf

Date and Time Comment Was Submitted: 2008-09-30 19:27:01

No Duplicates.

Comment 4 for Verification Warranty In-Use Compliance (verdev2008) - 15-1.

First Name: Jeff
Last Name: McDonald
Email Address: jmcdonald@rigmasterpower.com
Affiliation:

Subject: End User Device Component Swapping
Comment:

As an APU manufacturer currently in the process certifying a DECS, the amendments made to Chapter 14 are of great interest to me and my company. I am particularly interested in Component Swapping and Re-Designation Practices as it will affect the maintenance infrastructure, as well as its efficiency and quality for the end user.

While this addition will greatly affect large ownership fleets maintenance practices, it appears to have disregarded the independent owner-operator who may only have one DECS enabled auxiliary power unit. While some business does come from large fleets, the greater part of sales is done through dealer locations where individual units are sold and installed. By only allowing ownership fleets to swap out DPF‘s during maintenance procedures, you are effectively creating a double standard. A fleet will simply have the luxury of removing the uncleaned DPF and having a new one installed, of course following the provisions set forth by the ARB. Swapping a DPF occurs very quickly, thus allowing the truck to be on the road in a matter of an hour. However, for an independent operator who may only have one APU enabled DECS, it would require the operator to go to a dealer location, have the filter removed, sent to the cleaning facility, cleaned, shipped back and then installed. This is a procedure that could take days or weeks depending on the volume of units in the marketplace, scheduling, etc. If dealers were permitted to carry a stock of new and re-conditioned DPF’s available for swapping, you are in essence giving the owner-operator the same benefits as those given to the larger fleets. This scenario provides customers with an easy, efficient and most importantly cost effective service procedure. If the current amendments are allowed to stand, the independent owner is basically forced to purchase 2 DPF's. This method is not cost effective, and will only deter users from adopting these types of emission reduction strategies. I strongly recommend that further amendments be made to Chapter 14: Component Swapping and Re-Designation Practices, which will encompass all DECS users and not just ownership fleets.

As long as proper tracking and maintenance procedures are followed, there is no reason why the same practices set forth in the current amendments cannot be extended for dealer locations and/or DECS product lines.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-01 06:58:25

No Duplicates.

Comment 5 for Verification Warranty In-Use Compliance (verdev2008) - 15-1.

First Name: Anthony
Last Name: Fucaloro
Email Address: afucaloro@jsd.claremont.edu
Affiliation: Joint Science Department, Claremont Coll

Subject: RULEMAKING TO CONSIDER AMENDMENTS TO THE VERIFICATION PROCEDURE, WARRANTY AND IN-USE COMPL
Comment:

Dear CARB Members:

My public comments regard the efforts by CARB to control emissions from diesel engines in California. I want to state that I recommend that serious consideration be given to the June 17, 2008 petition challenging the August 27, 1998 CARB declaration regarding diesel particulate matter. This petition was submitted to Senator Don Perata by California professors James E. Enstrom, Matthew A. Malkan, Henry I. Miller, and Robert F. Phalen in accord with the provisions of Section 39662 (e) of the California Health and Safety Code.

I was a member of the CARB Scientific Review Panel (SRP) on Toxic Air Contaminants (TAC) when it declared diesel exhaust to be a TAC on April 22, 1998. At that time, I expressed my concerns to an official of the California Office of Environmental Health Hazard Assessment that the SRP was designating a substance as a TAC based upon imprecise and unreliable epidemiological studies. This official assured me that it was unlikely that CARB would use this declaration to impose an onerous set of regulations. By my lights, this is just what is happening now. Based on the reservations that I expressed in 1998, along with the epidemiologic and toxicologic evidence that has been published since 1998, I believe that the classification of diesel particulate matter as a TAC needs to be reassessed. This reassessment needs to be done as soon as possible given the tremendous expense and burdens associated with the numerous recent CARB regulations designed to reduce diesel emissions.

Furthermore, based on my examination of the California Health and Safety Code, I believe that appointments to the SRP may have not been made in accordance with all relevant code sections. Six SRP members, including five members who were on the SRP with me in 1998, have served much longer than the three-year term specified in Code Section 39670 (b). Based upon recent information that I have reviewed, CARB has not regularly asked the UC President to nominate at least three candidates for each SRP position in accordance with the Code Section 39670 (b) (4). Consequently, many highly qualified California scientists have never been considered for appointment on the SRP and have never been able to provide their diverse expertise on TACs. If not actual violations of the law, these practices appear to be in violation of the spirit of the law.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-10-01 10:27:29

No Duplicates.

Comment 6 for Verification Warranty In-Use Compliance (verdev2008) - 15-1.

First Name: James
Last Name: Enstrom
Email Address: jenstrom@ucla.edu
Affiliation:

Subject: Comment for Verdev2008
Comment:

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Please see attached comment letter.
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Attachment: www.arb.ca.gov/lists/verdev2008/33-32-carb_enstrom.pdf

Original File Name: 32-carb_enstrom.pdf

Date and Time Comment Was Submitted: 2008-10-01 15:38:21

No Duplicates.