



Leading the world in emission solutions

April 21, 2014

Board Members
Air Resources Board (ARB)

Re: CDTi Comments on ARB's Proposed Amendments to Truck and Bus Regulation

Dear Members of the Board:

Company Background

CDTi's Heavy Duty Diesel Systems Division (formerly Engine Control Systems Limited) is a long-term supporter of ARB's Diesel Risk Reduction Program since September 2000.

CDTi is headquartered in Ventura, California and operates in California, Nevada, Canada, United Kingdom, France, Japan and Sweden. The Company has a 30-year track record in heavy duty diesel retrofits. Our proprietary catalysts are manufactured at our state-of-the-art facility in Oxnard, California. CDTi has supplied over 11 million catalysts to various passenger car manufacturers and over 35,000 diesel retrofit systems since 2000. During the last decade, CDTi has invested many tens of millions of dollars in product development, system verifications (CARB, EPA, EU Agencies), and research and manufacturing facilities.

Our ARB verified products include Purifilter® H, Purifilter® L, Purifilter Plus®, Purifilter Plus® M, Purifilter® EGR and Combifilter®.

CDTi Supports MECA's Comments

CDTi fully supports the comments of our industry association, the Manufacturers of Emission Controls Association (MECA).

CDTi Does Not Support Increasing the Low Mileage Exemption

CDTi strongly believes that increasing the low mileage exemption is overly generous and will result in widespread underreporting of annual truck mileage and tampering of odometers and engine ECM's to avoid the cost of compliance. This added flexibility will consume valuable ARB resources in order to effectively enforce.



Leading the world in emission solutions

Over-Reliance on 2010 and Newer Used Trucks is Risky

CDTi contends that further relaxing the Truck and Bus Rule in favor of more purchases of used 2010 and newer model-year trucks is not a solution in the absence of an effective state Heavy Duty Inspection and Maintenance (I/M) Program. Most used trucks will have little or no remaining warranty coverage for emission control components in the event they are found to be deficient, and truck owners will try to minimize and avoid repair costs.

CDTi recommends the following actions:

- 1) Reduce the state Opacity Limit immediately to 2% for all 2007 or later model-year trucks.

A 2% Opacity Limit is realistic and protects the state's clear air goals. Such a limit discourages tampering and operating a truck with visible opacity. A future limit based on Particle Number should be considered.

- 2) Require HD truck inspection when selling a used truck or importing a used truck into California. This inspection should include documenting the engine is certified as a 2010 or newer truck engine and equipped with compliant and functioning emission control components.

CDTi knows of significant tampering throughout North America that includes the removal of compliant turbochargers, exhaust gas recirculation (EGR) and emission control components. The existence of a state HD I/M Program will immediately encourage truck owners to maintain their trucks for emissions compliance.

CDTi is also concerned that without an HD I/M Program, older pre-2010 and pre-2007 engines could be installed on 2010 and newer truck chassis.

- 3) Mandate MHD and HHD truck inspections every two years for vehicles older than five years.

During an HD truck's lifetime, many engines will undergo significant repair, rebuilding or replacement. HD truck inspection ensures that vehicles remain compliant.

- 4) Create an HD Aftermarket Parts Program to enable the competitive supply of aftermarket replacement emission control components.

Present policy requires that all replacement components should be "OE" equivalent. "OE" equivalency essentially results in monopoly of supply and high costs to owners.

A competitive market for replacement emission control components will result in lower costs for consumers while leveraging the existing emission control industry infrastructure thereby conserving related green jobs as a longer-term emissions control compliance market develops.

- 5) CDTi urges the Board to work with the legislature to establish requirements for a HD diesel I/M program. A heavy-duty diesel I/M program might offer the state a mechanism to receive SIP credits for the delivered emission reductions in much the same way that I/M affords for California's Smog Check program on light-duty vehicles.



Leading the world in emission solutions

Furthermore, CDTi urges against Truck and Bus Rule changes that create an uneven playing field for the trucking industry. Thousands of vehicle owners are incurring substantial capital and maintenance costs to operate roadworthy, emissions-compliant trucks. The proposed amendments will allow poorly maintained trucks to continue polluting to the detriment of public health and the environment. Adopting further amendments so late in the Rule unfairly rewards truck owners for non-compliance and encourages all fleets and all industries to delay compliance for future state environmental programs.

In closing, we urge the Board to stand firm and achieve ARB's clean air objectives. CDTi looks forward to having long-term operations and business success within the state of California.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Harris", with a long, sweeping horizontal line extending to the right.

Chris Harris
Chief Operations Officer

+1 805 205 1322
charris@cdti.com