

Statement
Of
Johnson Matthey, Inc.
Heavy-Duty Diesel North America
On The
State of California
CALIFORNIA AIR RESOURCES BOARD
Notice of Public Availability of Modified Text
PUBLIC HEARING TO CONSIDER AMENDMENTS TO THE VERIFICATION PROCEDURE,
WARRANTY, AND IN-USE COMPLIANCE REQUIREMENTS FOR
IN-USE STRATEGIES TO CONTROL EMISSIONS FROM DIESEL ENGINES

Johnson Matthey appreciates the opportunity to provide comments on the proposed 15-day modifications to the proposed amendments to the Verification Procedure, Warranty, And In-Use Compliance Requirements For In-Use Strategies To Control Emissions From Diesel Engines.

Johnson Matthey is a technology company that has been providing advanced catalytic solutions to reduce emissions for over thirty years. We have worked with both the ARB and EPA to develop and provide ever increasingly advanced technology solutions to reduce emissions from both mobile and stationary sources. Johnson Matthey fully supports the goal of the ARB's Diesel Risk Reduction Program to significantly reduce particulate matter from California's inventory of existing diesel engines.

Johnson Matthey has worked with ARB staff since 2000 on developing and refining the Verification Procedure and its elements for control of emissions from diesel engines as well as to verifying Level 3 PM technologies to support the various Rules in the Diesel Risk Reduction Program.

Since the Board directed ARB staff to work with DECS manufacturers in December 2010 regarding economic relief to DECS manufacturers, Johnson Matthey along with the Manufacturers of Emission Controls Association (MECA) and its other members have worked with ARB staff to develop and refine the modifications to the Verification procedure.

We would like to thank ARB for working with us to develop the economic relief surrounding in-use testing, to improving the clarity of the Procedure and we support the changes that have been proposed. We would like the Board to consider a couple of additional clarifications. These are:

- § 2701. Definitions ~~(28)~~ (29) – JM believes that the language around an “authorized installer” should be expanded beyond installation and should include service and warranty work with verified components. This would not limit those who would provide cleaning services as long as the proscribed DECS cleaning specification was met.
- § 2706. Other Requirements (i) Component Swapping and Re-Designation Practices (2) Device Re-Designation Practices (A) – JM believes that it would be overly burdensome to the Executive Officer to have to approve each and every individual re-designation request. JM believes that once the Swapping & Re-Designation Policies are approved by ARB, the need for the EO to approve each case is not necessary.
- § 2706. Other Requirements (n) Installation manual (1)(2) – JM believes that reference to an authorized “person” should be struck and only “company” be retained. The reason for this is that people who have worked for authorized companies have left those companies and because they have been trained, often represent themselves as “authorized.”

Once again we thank ARB staff and the Board for all your hard work.

Marty Lassen
Johnson Matthey
Director – Regulatory Affairs
13 June 2013



