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Clerk of the Board
California Air Resources Board
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06/07/18

Clerk of the Board
California Air Resources Board
1001 "I" Street
Sacramento Ca 95814

Subject: Comments on the Proposed Amendments to the Periodic Smoke
Inspection Program.

Dear Chairman Nichols and Members of the Board:

The Alliance for California Business resolutely objects to the proposed changes to the PSIP smoke testing rules. The proposal lacks sufficient research and study of diesel engine technology and standards as taught and accepted by the industry as its best practices. We also notice that no timeframe is listed for this sweeping change. This omission tells us the proposal is premature.

The Society of Automotive Engineers, SAE J1667, which is the seminal work on how to conduct an opacity test, was written in 1996 and has not been revised. As the Board and staff know, much has changed in the field of diesel engine technology; yet, this document remains the basic document used in classes by industry instructors for certified field testers and is the reference document for policy and procedures. All certifications nationwide have relied on this document for over 20 years. Thousands of certified testers need to be re-trained with a current curriculum. This has not been addressed in the CARB proposal.

Within the first 12 pages of J1667 Recommended Field Practices, the "snap acceleration" procedure is detailed. When written in 1996, throttle linkage was mechanical; however, in today's engines the throttle is "fly by wire" computer controlled. This is but one glaring difference needing revision. Additionally, the importance of proper engine operating temperature must be achieved before an accurate opacity test is done. The only approved VDECS fails to control emissions until operating temperature is achieved. This takes from 30 to 45 minutes with the engine under load. This provides another example of the need for current policies, practices, and rules for a proper PSIP test.

All CARB smoke testing certified schools would be required to re-train and re-certify testers under a current policy and procedure regimen. The document itself would need to be approved by industry-recognized experts, such as SAE. This will be a time-consuming process.

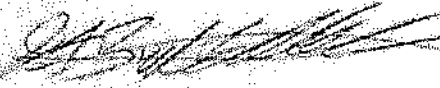
This is but one glaring difficulty of simply changing the standards for opacity. As the parameters for pass/fail are tightened it is vital that the procedure be done correctly; otherwise, false fails will increase, and the owner will be cited.

During the CARB's May 25, 2018 meeting, the conflicts between the data compiled by the DMV and the data compiled by CARB was brought up once again. Staff was confident these differences would be worked out. The Alliance reminds the Board that it is the owner who is jeopardized by an incomplete or not fully understood resolution by the two agencies. A resolution must be clear to the hundreds of inspectors and testers in order to avoid an unwarranted citation. Industry - not DMV or CARB staff - bears the brunt of correction of the citation in a timely manner, the fines and penalties, as well as the out-of-service costs. We all have life experiences of trying to correct errors by government agencies.

The CARB Board and staff are fully aware of how the VDECS operates in the field and how proper procedures must be followed to conduct an accurate smoke test. The Southwest Research study proves it, as does the University of Denver study comparing air quality between the Cottonwood scales and the Port of Los Angeles. None of this information is addressed in the proposal. These two studies reinforce the need for smoke testing to be done properly and accurately. Much more work must be done before a proposed change should be contemplated.

Technology must be properly evaluated and current - otherwise it is not advanced technology, but just something new. Once again, we reiterate that the consequences of the ill-considered changes to this rule will be borne by Industry. We believe strongly that this idea should be shelved until a more complete study and thorough understanding, including a proper evaluation of the consequences, is done by CARB.

Sincerely,



Bud Caldwell, President
Alliance for California Business