

*Robert Dorazio**07-5-6*

To: CARB attn CLERK OF THE BOARD
Sacramento, CA

Re: Proposed 2007 Regulation for In Use Off-Road Diesel Vehicles
From Robert Dorazio Phone 805 481 0713
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I am interested in the upcoming regulation. However, I am not very familiar with:
the differences in the emissions from an older diesel engine compared to a newer one. A characteristic of mechanical fuel injection may be the higher nitrous oxide independent of the visible emission.

the benefit that a retrofit or add on exhaust (non urea) catalyst can achieve
the emissions when comparing an older engine in a good tune versus one that is not, nor the technology available to measure emissions, and also if they can be reduced by adjustment.

Given my unfamiliarity, would you be kind enough to consider the following suggestions

1. Older machines (5 years or greater), from my experience, do not accrue the annual operating hours that a newer machine achieves. They are, more often than not, usually in a limited or reduced capacity status which can serve important or necessary functions. Any worthy regulation must distinguish this aggregate usage for basis determinations.
2. Initial measures that include a retrofit exhaust system (such as a catalyst) and perhaps some form of adjustment with a measurement to validate improvements if these solutions offer some benefit.
3. A problem with re-powering may be if the oem does not offer a more advanced technological solution. Regulations that require this will not attain the objective as they would effectively obsolete these machines.

A emission reduction program should have goals to reduce the emissions per unit of work done - especially in areas where the air pollution is already a known problem. The program should include public information and promotional efforts initially and should be written to allow effective administration without undue bureaucracy. It would be expected the initial program rule would not cause a grievous economical or technological difficulty. The financial burden from unfeasible solutions would be overwhelming to small businesses and burdensome to others. Regardless of the regulation, unless the effectiveness can be validated, it can not be adopted without being considered arbitrary.

Sincerely and thank you


Robert Dorazio (original sent by USMail)