



Advanced Emission Controls®

December 4, 2008

Chairman Mary Nichols
CA Air Resources Board
1001 "T" Street
Sacramento, CA 95812

James Goldstene
Executive Officer
CA Air Resources Board
1001 "T" Street
Sacramento, CA 95812

Re: Public Hearing to Consider the Adoption of Proposed Regulation to Control Emissions from In-Use On-Road Diesel Vehicles

Dear Chairman Nichols and Mr. Goldstene:

Cleaire appreciates the opportunity to provide comments on the California Air Resources Board (ARB) proposed regulation to control emissions from In-use On-road Diesel Vehicles. Please view this letter as an indication of Cleaire's support for the proposed regulation.

As a retrofit provider, Cleaire stands ready to provide cost-effective rule compliance options in the form of a portfolio of Level 3 verified diesel emission control systems (VDECS). Cleaire has extensive experience with NOx/PM reduction systems and PM reduction systems for trucks, buses, and school buses. Over 4,000 systems have been deployed across a wide range of applications, primarily to achieve compliance with ARB regulations or to play a role in incentive programs. Several additional retrofit systems are currently in the ARB verification process. These systems will offer additional retrofit compliance options for this rule, and will result in immediate and cost-effective air quality benefits throughout California.

As background, Cleaire is a California-based company that is a leader in developing the highest-efficiency ARB-verified diesel emission control systems (Level 3 VDECS). In preparing to engineer compliance retrofits for this regulation, Cleaire has engaged with truck, transit bus, and school bus fleet owners and operators, regulatory agencies, environmental groups, and community leaders to better understand the needs of each stakeholder and to understand how our technologies can play a role in ARB's proposed air quality solution.

We also work very closely with ARB staff on two fronts. First, by interacting and sharing data during the rigorous product verification process, and second by providing input on rule and program development based on our perspective as a supplier of technology solutions.

Based on our experience with diesel retrofit technology and our interaction with the key stakeholders we would like to commend and thank staff for their efforts to develop a regulation that recognizes the availability and value of retrofits as a viable compliance option.

Retrofits provide the most cost-effective reduction of PM and NOx, and recaptures the anticipated useful life of the vehicle. Recapturing the anticipated useful life of the vehicle results in reduced compliance costs to affected truck and fleet owners and allows a more “normal” fleet turn-over.

Retrofits create “Green Collar” jobs in California. Cleaire is headquartered in San Leandro, with a testing facility in Richmond, and manufacturing facility in San Diego. Our retrofit systems are designed, engineered, tested, and assembled in California, resulting in job creation in the green tech market sector. More jobs will be created in the Cleaire dealer network to support the retrofit sales, installation and service, creating a gateway to career path employment. Installations performed by other retrofit supplies will result in even more jobs in this sector.

School bus retrofits are proven and readily available to meet the compliance targets ARB has set forth in the regulation. There is sufficient incentive funding available to retrofit a significant portion, if not all of California’s school buses¹ with Level 3 particulate filters, thus ensuring that every child will ride on a clean bus. Cleaire along with other retrofit manufacturers has several thousand retrofits currently installed on California school buses. Retrofit devices are proven, cost-effective, and they result in an immediate air quality benefit.

Cleaire will continue to develop the highest quality Level 3 VDECS to help ARB achieve diesel PM and NOx reduction goals for health and air quality.

Thank you for considering the comments provided in this letter. Cleaire looks forward to working with ARB and continuing to provide technologies that enable cleaner air for California.

Sincerely,



Dr. Bradley L. Edgar
President

¹ The Cleaire Horizon is verified for all makes and model of 4-stroke engines from 1960 to 2006 up to 15 liters displacement.