



Donaldson.
Filtration Solutions

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**STATEMENT FROM DONALDSON COMPANY, INC.
ON THE AI RESOURCES BOARD'S
PROPOSED REGULATORY AMENDMENTS TO THE
VERIFICATIUN PROCEDURE, WARRANTY AND IN-USE
COMPLIANCE REQUIREMENTS FOR IN-0USE STRATEGIES TO
CONTROL EMISSIONS FROM DIESEL ENGINES**

January 27, 2010

Donaldson Company, Inc. is pleased to provide testimony in overall support of ARB's proposed amendments to the verification procedure, warranty and in-use compliance requirements for existing on-road, off-road and stationary diesel-fueled vehicles and equipment.

Donaldson is headquartered in Minneapolis, Minnesota, and is a leading worldwide provider of filtration systems and replacement parts. The Company serves Customers in the industrial and engine markets with a product mix which includes air and liquid filters and exhaust and emission control markets.

Donaldson is also a member of the Manufacturers of Emission Control Association (MECA) and has been actively working with EPA and California ARB staff to develop and provide diesel retrofit control technology in support of ARB's Diesel Risk Reduction Plan (DRRP) and EPA's Voluntary Diesel Retrofit Program (VDRP). Donaldson presently has Verified retrofit technologies and is a leading supplier for both ARB's DRRP program and for EPA's VDRP. Specific reference and background to Donaldson's emission control technologies may be accessed from our corporate web site at www.donaldson.com/emissions.

Donaldson supports overall MECA comments or positions regarding ARB's proposed amendments. Donaldson does wish to provide, however, additional comments concerning certain aspects of ARB's staff proposal.

Specifically, Donaldson has concerns over aspects of proposed changes to the maintenance requirements, Section 2706(h) for VDECS. In subsection (2) proposed changes require that applicants provide detailed maintenance information sufficient to enable an owner to properly maintain the VDECS without requiring services be provided exclusively by the applicant or the applicant's distributor.

MECA and Donaldson have previously shared our concerns with ARB relating to the use of independent third party cleaning services with some type of approval process by the VDECS supplier. Donaldson is concerned about potential damage that improper cleaning can cause VDECS cores by untrained personnel using inappropriate cleaning equipment. We believe ARB should create an approval process to minimize VDECS damage risk.

As an example of this type of approval process, Donaldson now has Certified Dealers in California that currently offer Donaldson approved Level 3 diesel filter cleaning services. These dealers are Donaldson Certified, have Donaldson cleaning equipment and have been trained to provide Donaldson approved cleaning services for Level 3 diesel filters.

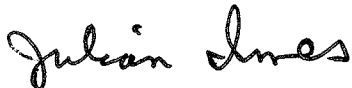
End users who seek to complete Donaldson approved in-house Level 3 Diesel filter cleaning need to work through a Donaldson Certified Dealer in California. The Donaldson Certified Dealer will offer Donaldson cleaning equipment and provide necessary training to end users to gain Donaldson approval of the Level 3 diesel filter cleaning process.

Donaldson also suggests responsibility clarifications for the proposed change in Section 2706(t) relating to pre-installation compatibility assessment. In subsection (4), ARB indicates the need for installers to conduct a proper due diligence of the engine prior to installing a VDECS and maintaining all records associated with the conclusion of compatibility. Donaldson supports MECA statement comments that flexibility should be allowed in these requirements but also suggests that pre-installation assessments and associated documentation requirements be mutual responsibilities of the equipment owner and the VDECS installer.

In closing, we commend the Air Resources Board and its staff members for continuing efforts with healthy air quality and in implementing the Diesel Risk Reduction Plan. Donaldson intends to provide continued commitment and support of ARB's objectives and looks for continued cooperative effort with ARB staff and other stakeholders.

Sincerely,

Donaldson Company, Inc.

A handwritten signature in black ink that reads "Julian Imes". The signature is written in a cursive, flowing style.

Julian Imes
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and Government Affairs
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