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Gray Davis
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Mail-Out #MSC-01-06

April 17, 2001

TO: All Interested Parties

SUBJECT: PUBLIC WORKSHOP REGARDING THE RETROFIT VERIFICATION
PROCEDURE FOR ON-ROAD, OFF-ROAD, AND STATIONARY
DIESEL-FUELED VEHICLES AND EQUIPMENT

Background: In August 1998, the Air Resources Board (ARB) identified particulate matter (PM) exhaust from diesel-fueled engines as a toxic air contaminant. Following that determination, the ARB formed a Diesel Advisory Committee with a wide variety of stakeholders to develop a Diesel Risk Reduction Plan (DRRP). The DRRP, approved by the Board in September 2000, identified retrofitting of in-use engines as a vital component of the overall PM control strategy.

ARB staff has recently begun the public process of developing regulations for the retrofit of in-use engines. Within the next few years, we plan to develop regulations that address on- and off-road diesel-fueled engines, as well as stationary and portable engine applications. For more information, you may access ARB's website:
<http://www.arb.ca.gov/diesel/dieselrrp.htm>.

Workshop: In order to assist the manufacturers of retrofit emissions controls, the ARB staff will hold a public workshop to discuss the requirements for verifying emissions reductions from the use of retrofit devices on diesel engines. Issues to be discussed include the process of the retrofit verification procedure, test requirements and reporting requirements.

Date: May 10, 2001
Time: 9:30 a.m. to Noon
Location: Annex IV Auditorium
9530 Telstar Avenue
El Monte, California

Retrofit Verification Procedure: The most current draft of the retrofit verification procedure is included as Attachment 1. The procedure outlines information necessary to verify reductions from equipment-based emission control systems; it does not address emissions reductions due to fuel modifications. If you are interested in having ARB review and verify fuel modifications to reduce emissions, please contact Mr. Gary Yee at (916) 327-5986.

The current draft has several revisions from the draft issued in July of 2000. These differences include the addition of the New York Bus Cycle Test for chassis testing and the availability of conditional verification prior to completion of the durability demonstration, in addition to greater specificity overall. It should be noted that although there is a section for in-use inspection and testing, those requirements have yet to be determined. Furthermore, the staff is concerned about a number of other issues: (1) the performance of emissions control devices during and immediately after extended engine idling, (2) the nature and disposal of ash, (3) safety, and (4) uncontrolled regeneration. Staff specifically requests comments on those topics.

Interim Retrofit Verification: In recognition of the major role that retrofit technologies must play in the reduction of public exposure to diesel PM, the staff has committed to providing an interim verification of the emission reduction claims of retrofit technologies. The ARB has already begun evaluation of some retrofit emission control systems, and encourages all interested manufacturers to participate.

To begin the verification process, a manufacturer should contact ARB staff to discuss its product and its plan to meet the verification requirements. If the emission control system is to be used on a certified engine, the manufacturer will also need to take steps to receive a Vehicle Code 27156 exemption. The exemption allows sales and installation of the reviewed emission control system in the State of California (without emission reduction claims).

To expedite review, the manufacturer's application should follow the format shown in Attachment 2. If ARB determines that the emission control system meets the minimum requirements, the manufacturer will be provided with verification of emission reductions in the form of a letter. The verification letter states ARB has reviewed and verified the claims of emission reductions based on data provided for the emission control system.

ARB staff will be available to discuss all the requirements described in the procedure and to provide feedback on the manufacturer's test plan to ensure that the necessary data for the verification process are obtained. Additionally, ARB staff may be available to assist manufacturers in the testing and data collection process.

Manufacturers wishing to participate in the verification process should mail applications to:

Air Resources Board
Mobile Source Control Division
9528 Telstar Avenue
El Monte, CA 91731
Attn: Mr. Robert H. Cross, Chief

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Written Comments: Staff encourages written comments regarding the retrofit verification procedure. To ensure that any confidential information be handled properly, commenters should identify confidential information as such when submitted. The guidelines for the ARB's handling of designated confidential information can be found in the website (<http://www.arb.ca.gov/regact/confid.htm>). Comments will be most helpful if they are submitted prior to the workshop so that they may be incorporated into the workshop discussion.

Should you have any questions or comments regarding the workshop or the verification procedure, please contact Dr. David Chou by e-mail at cchou@arb.ca.gov or by phone at (626) 450-6109 or contact Mr. Scott Rowland, Manager, Retrofit Assessment Section, by e-mail at srowland@arb.ca.gov or by phone at (626) 575-6972.

Sincerely,

Robert H. Cross, Chief
Mobile Source Control Division

Attachments