Air Resources Board

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TO: All Interested Parties

SUBJECT: Importance Of Proper Maintenance Of Diesel Engines Equipped With Retrofit Devices

The purpose of this advisory is to provide guidance to owners and operators of diesel vehicles and equipment on the importance of following good engine maintenance practices, in particular with engines that are equipped with retrofit devices. Installation of a retrofit device to control emissions does not in any way mean engine maintenance can be reduced or neglected. Rather, proper engine maintenance is a key part of staying in compliance with the Air Resources Board's (ARB) in-use diesel fleet regulations and is critical to ensuring that a vehicle equipped with a retrofit device continues to operate without problems.

If an end-user uses a retrofit to comply with the requirements of an ARB regulation, that retrofit must be verified by ARB under the *Verification Procedure, Warranty and In-Use Compliance Requirements for In-Use Strategies to Control Emissions from Diesel Engines* (the Procedure). After a retrofit is verified under the Procedure, ARB issues a document called an Executive Order which lists all the terms and conditions that must be met for the verification to be valid (for a listing of currently verified retrofits, please visit the ARB website at http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm). Simply using a verified retrofit, however, is not enough to ensure compliance. The retrofit must also be used in a manner consistent with its Executive Order. Keeping the engine in a proper state of maintenance is one of these conditions. A poorly-maintained engine can cause damage to a retrofit and prevent it from performing at its verified level. As such, proper engine maintenance is necessary for compliance with ARB regulations.

In addition, if a retrofit device still under warranty is damaged while installed on a poorly-maintained engine, the retrofit manufacturer might deny warranty coverage. As a result, the end-user may have to spend thousands of additional dollars to repair or replace the retrofit to continue to comply with ARB regulations. ARB strongly encourages end-users to talk to the device installer about maintenance needs before and after installation of the device. Many devices can mask the usual signs of engine trouble, such as black smoke, which further motivates the need to follow a regular maintenance schedule and not to simply wait for more serious problems to arise.

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Another part of complying with ARB regulations is avoiding the use of any alternative diesel fuels or fuel additives that are not specifically listed on a retrofit device's Executive Order. Using unapproved fuels or additives is illegal and strictly prohibited. Doing so may adversely affect the performance and durability of the retrofit, will affect an end-user's warranty rights and protection, and brings a vehicle out of compliance with ARB regulations that require retrofits to be verified. For more information, please see Enforcement Advisory Number 379, which can be found on the ARB website at http://www.arb.ca.gov/enf/advs/advs379.pdf .

Should you have any questions regarding this advisory, please contact Ms. Kathleen Mead, Manager, Retrofit Implementation Section, at (916) 324-9550 or by email to kmead@arb.ca.gov.

Sincerely,

/s/

Robert H. Cross, Chief
Mobile Source Control Division

cc: Kathleen Mead, Manager
        Retrofit Implementation Section