TO:    ALL INTERESTED PARTIES
DATE:  October 10, 2008
SUBJECT: FAILURE OF COMPONENT(S) OF A VERIFIED DIESEL EMISSION
CONTROL STRATEGY PAST THE WARRANTY PERIOD, EFFECTS ON
THE REPLACEMENT, AND REASSIGNING BEST AVAILABLE CONTROL
TECHNOLOGY

The purpose of this advisory is to define a failure of a verified diesel emissions control
strategy (DECS) after the warranty period, including replacement of component(s)
and/or reassigning replacement DECS in accordance with applicable regulations.
California Code of Regulations, title 13, section 2707, of the Verification Procedure for
the In-Use Strategies to Control Emissions from Diesel Engines outlines the warranty
requirements that the person or company installing a DECS must fulfill for the product
and its installation. A copy of the warranty is to be provided to the end-user identifying
the warranty period. The following addresses what steps are required for replacement
of components not directly related to the filtration of the engine exhaust.

If a component of a DECS fails, it is essential to evaluate the component failure with its
affect on the overall performance of the DECS. If the installer and the device owner
cannot certify that the device is meeting its original emission reductions as verified, the
entire system must be replaced with a DECS meeting best available control technology
(BACT) as defined in the applicable regulation for the equipment. Failure of a core
component such as a device substrate (diesel oxidation catalyst, diesel particulate filter
or flow-through-filter, nitrogen oxides (NOx) catalyst, selective catalytic reduction, etc.),
fuel additive dosing system, and/or electronic control element/module requires complete
system replacement with BACT. Typically BACT determination is based on engine age,
vehicle duty cycle, engine family, and other factors.

This is only applicable for Level 3 DECS and would not apply to Level 1 and Level 2
devices, nor Level 3 systems with verified NOx reductions as extensive testing is
required to determine efficiency. The installer must prove that the device is working per
verification requirements with the component change. The owner will need to work
closely with the DECS distributor and / or the installer to ensure that highest level BACT
is installed.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.
For a list of simple ways you can reduce demand and cut your energy costs, see our website: http://www.arb.ca.gov.
Should you have any questions about this advisory, please contact Ms. Kathleen Mead, Manager, at (916) 324-9550 or email at kmead@arb.ca.gov.

Sincerely,

/s/

Robert H. Cross, Chief
Mobile Source Control Division

cc: Kathleen Mead, Manager
Retrofit Implementation Section