

California Environmental Protection Agency



**Supplement to the Final Statement of Reasons
for Rulemaking**

**VERIFICATION PROCEDURE, WARRANTY AND IN-USE COMPLIANCE
REQUIREMENTS FOR IN-USE STRATEGIES TO CONTROL EMISSIONS
FROM DIESEL ENGINES**

Public Hearing Date: January 28, 2010
Agenda Item No.: 10-1-3

a) Proposed Amendment to Section 2706(t)(2)(G)(3.)

The verification procedure in its entirety is designed to be flexible to accommodate the potentially huge range of technologies and applications which may be encountered. Different systems may have different failure modes, and different incompatibilities with duty cycles and/or candidate engines. Additionally each device manufacturer may have different requirements for their systems, and for their systems in different applications. Thus, each Executive Order is unique. What may be a requirement of one system may not be relevant for another. The preassessment of a candidate vehicle needs to reflect the differences in system requirements and differences in the Executive Orders.

For example:

A fuel based technology may be incompatible with fuel filters (on the engine) which are sensitive to water. Thus, when such a vehicle is assessed, the assessment would need to ensure it does not have an incompatible fuel filter.

A different technology may not employ fuel changes at all, but would be simply hardware. However, it is extremely sensitive to engines which are burning excessive oil, and such engines may cause catastrophic device failure. This system would require the candidate engine to be assessed for excessive oil consumption and/or failing engine components which will result in excessive oil consumption.