

State of California  
AIR RESOURCES BOARD

EXECUTIVE ORDER D-182  
Relating to Exemptions Under Section 27156  
of the Vehicle Code

WALKER MANUFACTURING  
"NEW AFTERMARKET OXIDATION CATALYTIC CONVERTER"  
SERIES 15111-15115

WHEREAS, Vehicle Code Section 27156 and Title 13 California Code of Regulations (hereafter "CCR") Section 2222(h), authorize the California Air Resources Board (ARB) and its Executive Officer to exempt new aftermarket catalytic converters from the prohibitions of Vehicle Code Section 27156.

WHEREAS, Walker Manufacturing has applied to the ARB for exemption from the prohibitions of Vehicle Code Section 27156 for the two-way catalytic converter series 15111-15115.

WHEREAS, pursuant to the authority vested in the Executive Officer by Health and Safety Code Section 39515 and in the Chief, Mobile Source Division by Health and Safety Code Section 39516 and Executive Order G-45-5, the Air Resources Board finds that the above aftermarket catalytic converter complies with the California Vehicle Code Section 27156 and Title 13, California Code of Regulations, Section 2222(h).

IT IS HEREBY RESOLVED that the above catalytic converter is exempt from the prohibitions of Vehicle Code Section 27156 for installation on the approved application vehicles subject to the following conditions:

1. No changes are permitted to the converter as described in the application for exemption. Any changes to the converter, applicable model year, or other factors addressed in this order must be evaluated and approved by the Air Resources Board prior to marketing in California.
2. Marketing of the converter using an identification other than that shown in the exemption application or marketing of the converter for an application other than those listed in the application catalog shall be prohibited unless prior approval is obtained from the Air Resources Board. Exemption of this product shall not be construed as an exemption to sell, offer for sale, or advertise any component of the product as an individual device.
3. Any oral or written references to this Executive Order or its content by Products for Power, its principals, agents, employees, distributors, dealers, or other representatives must include the disclaimer that the Executive Order or the exemption it provides is not an endorsement or approval of any emissions reduction claims for the catalytic converter and is only a finding that the converter is exempt from the prohibitions of Vehicle Code Section 27156.

Violation of any of the above conditions shall be grounds for revocation of this order. The order may be revoked only after ten day written notice of intention to revoke it, during which period the holder of the order may request in writing a hearing to contest the proposed revocation. If a hearing is requested, it shall be held within ten days of receipt of the request, and the order may not be revoked until a determination is made, after the hearing, that grounds for revocation exist.

Executed at El Monte, California, this 22<sup>nd</sup> day of August, 1988.



K. D. Drachand, Chief  
Mobile Source Division

State of California  
AIR RESOURCES BOARD

EXECUTIVE ORDER D-182-1  
Relating to Exemptions Under Section 27156  
of the Vehicle Code

WALKER MANUFACTURING COMPANY  
"NEW AFTERMARKET 2-WAY AND 3-WAY CATALYTIC CONVERTERS"

WHEREAS, Vehicle Code Section 27156 and Title 13 California Code of Regulations (hereafter "CCR") Section 2222(h), authorize the California Air Resources Board (ARB) and its Executive Officer to exempt new aftermarket catalytic converters from the prohibitions of Vehicle Code Section 27156.

WHEREAS, Walker Manufacturing Company has applied to the ARB for exemption from the prohibitions of Vehicle Code Section 27156 for the 2-way and 3-way catalytic converters series 15111 to 15124 for the following applications:

<u>Converter Type</u>	<u>Engine Size Limit</u>	<u>Maximum Veh. Weight</u>
2-Way	400 C.I.D. (6.6L)	6,000 lbs.
3-way w/o air	232 C.I.D. (3.8L)	3,750 lbs.

WHEREAS, pursuant to the authority vested in the Executive Officer by Health and Safety Code Section 39515 and in the Chief, Mobile Source Division by Health and Safety Code Section 39516 and Executive Order G-45-5, the Air Resources Board finds that the above aftermarket catalytic converters comply with the California Vehicle Code Section 27156 and Title 13, California Code of Regulations, Section 2222(h).

IT IS HEREBY RESOLVED that the above catalytic converters are exempt from the prohibitions of Vehicle Code Section 27156 for installation on the approved application vehicles subject to the following conditions:

1. No changes are permitted to the converters as described in the application for exemption. Any changes to the converters, applicable model year, or other factors addressed in this order must be evaluated and approved by the Air Resources Board prior to marketing in California.
2. Marketing of the converter using an identification other than those shown in the exemption application or marketing of the converters for an application other than those listed in the application catalog shall be prohibited unless prior approval is obtained from the Air Resources Board. Exemption of these products shall not be construed as an exemption to sell, offer for sale, or advertise any component of the converter as an individual device.

WALKER MANUFACTURING COMPANY  
"NEW AFTERMARKET 2-WAY AND  
3-WAY CATALYTIC CONVERTERS"

EXECUTIVE ORDER D-182-1  
(Page 2 of 2)

3. Any oral or written references to this Executive Order or its content by Walker Manufacturing Company its principals, agents, employees, distributors, dealers, or other representatives must include the disclaimer that the Executive Order or the exemption it provides is not an endorsement or approval of any emissions reduction claims for the catalytic converters and is only a finding that the converters are exempt from the prohibitions of Vehicle Code Section 27156.

Violation of any of the above conditions shall be grounds for revocation of this order. The order may be revoked only after ten day written notice of intention to revoke it, during which period the holder of the order may request in writing a hearing to contest the proposed revocation. If a hearing is requested, it shall be held within ten days of receipt of the request, and the order may not be revoked until a determination is made, after the hearing, that grounds for revocation exist.

Executed at El Monte, California, this 7<sup>th</sup> day of November, 1988.



K. D. Drachand, Chief  
Mobile Source Division

State of California  
AIR RESOURCES BOARD

EVALUATION OF WALKER NEW AFTERMARKET TWO-WAY AND  
THREE-WAY CATALYTIC CONVERTERS FOR EXEMPTION  
FROM THE PROHIBITIONS OF VEHICLE CODE SECTION 27156 AND  
TITLE 13, CALIFORNIA CODE OF REGULATIONS, SECTION 2222(h)

October, 1988

EVALUATION OF WALKER NEW AFTERMARKET TWO-WAY AND  
THREE-WAY CATALYTIC CONVERTERS FOR EXEMPTION  
FROM THE PROHIBITIONS OF VEHICLE CODE SECTION 27156 AND  
TITLE 13, CALIFORNIA CODE OF REGULATIONS, SECTION 2222(h)

by

Mobile Source Division

State of California  
AIR RESOURCES BOARD  
9528 Telstar Avenue  
El Monte, CA 91731

(This report has been reviewed by the staff of the California Air Resources Board and approved for publication. Approval does not signify that the contents necessarily reflect the views and policies of the Air Resources Board, nor does mention of trade names or commercial products constitute endorsement or recommendation for use.)

SUMMARY

Walker Manufacturing Company of Grass Lake, Michigan, has applied for exemption on their new aftermarket two-way and three-way catalytic converters under the new California regulations on new aftermarket catalytic converters. The new California regulations require conversion efficiencies of 70% for HC and CO, 60% for NOx on three-way converters and 50% for three-way plus new aftermarket catalytic converters.

Emissions data submitted show that the Walker two-way and three-way catalytic converters meet the requirements of Vehicle Code Section 27156 and Title 13, California Code of Regulations, Section 2222(h). Based on the above, the staff recommends that the exemption be granted as requested.

CONTENTS

	<u>Page Number</u>
<u>SUMMARY</u>	i
<u>CONTENTS</u>	ii
I. <u>INTRODUCTION</u>	1
II. <u>CONCLUSION</u>	1
III. <u>RECOMMENDATIONS</u>	1
IV. <u>DEVICE DESCRIPTION</u>	1
V. <u>DEVICE EVALUATION</u>	2
VI. <u>DISCUSSION</u>	3

EVALUATION OF WALKER NEW AFTERMARKET TWO-WAY AND  
THREE-WAY CATALYTIC CONVERTERS FOR EXEMPTION  
FROM THE PROHIBITIONS OF VEHICLE CODE SECTION 27156 AND  
TITLE 13, CALIFORNIA CODE OF REGULATIONS, SECTION 2222(h)

I. INTRODUCTION

Walker Manufacturing Company of Grass Lake, Michigan, has applied for an exemption for their new aftermarket two-way and three-way catalytic converters in accordance with the new California regulations on new aftermarket catalytic converters.

II. CONCLUSION

The applicant has submitted all the required information and based on the submitted exhaust emissions test data, the staff concludes that the two-way and three-way catalytic converters meet the criteria set forth in Vehicle Code Section 27156 and Title 13, California Code of Regulations, Section 2222(h).

III. RECOMMENDATION

The staff recommends that the exemption be granted as requested and that Executive Order No. D-182-1 permitting the advertisement, sales and installation of the new aftermarket catalytic converters be issued.

IV. DEVICE DESCRIPTION

The Walker two-way catalytic converter consists of honeycomb type substrates coated with platinum and palladium and enclosed in an outer shell or container of stainless steel. The three-way catalytic converter consists of honeycomb type substrates coated with platinum, palladium and rhodium enclosed in an outer shell or container of stainless steel.

The Walker Manufacturing Company catalytic converters use materials and construction similar to the original equipment manufacturers. The catalytic converters are sold with installation instructions and kits as shown in the application catalog. They are also sold with a two year or 25,000 mile warranty on the substrates and five years or 50,000 miles on the container or shell.

V. DEVICE EVALUATION

Walker Manufacturing Company provided test data on the catalytic converters. The tests on the two-way converter were conducted by Olson Engineering Inc., Huntington Beach, California. The conversion efficiencies for the two-way converter are 81.8 for HC and 92.9 for CO. The conversion efficiencies for the three-way converter are 87.6 for HC, 80.6 for CO and 65.9 for NOx. The tests on the three-way converter were conducted by Intelligent Controls, Inc., Livonia, Michigan, which is an EPA approved test laboratory. All of the above conversion efficiencies meet the requirements of the new California regulations.

The staff based the evaluation of the new aftermarket two-way and three-way converters on the data from Olson Engineering and Intelligent Controls tests.