



Subsidiary of Federal Signal Corporation

Jay Wells
Well Sweeping Company
5425 Marmith Avenue
Sacramento, CA 95841

Jay,

I have spoken to representatives at ARB and have gotten some clarification on your older sweeper auxiliary engines. ARB is in fact requiring special permits for older emission level engines and will no longer allow the permitting or use of prior certified engines after the 2008 calendar year.

This leads to the possibility of re-powering older emission engines with new, current emission engines. While on the surface, re-powering might appear as a viable solution to the problem, Elgin Sweeper Company is not recommending the procedure and is not involved in this process at an OEM level. As a manufacturer, we have been engaged in the process of designing Tier 3 off-highway engines into sweeper bodies. Based on our experience, we feel that this design process is far too complex and sensitive to be attempted outside of a new equipment manufacturing environment. For chassis engines, the complexity of EPA 07 engines is so great that even OEM engine installations should only be attempted by dedicated on-highway vehicle or on-highway engine manufacturers. Elgin Sweeper is not planning on developing any retrofit kits for EPA 07 on-highway engines or Tier 3 off-highway engines.

I realize that this is not good news in our current business climate of escalating fuel and labor costs. I have several suggestions that might help you going forward. Your older emission level sweepers are still viable outside of California. You might consider exporting them out of the state and replacing them with new models. There are several incentive programs that could help you defray the costs of purchasing lower emission sweepers.

I have listed the programs below.

Best regards

A handwritten signature in black ink that reads "Brian Giles". The signature is written in a cursive, flowing style.

Brian Giles
Sweeper Products Manager