UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY
2565 PLYMOUTH ROAD
ANN ARBOR, MICHIGAN 48105-2498

OFFICE OF
AIR AND RADIATION

August 21, 2013

Mr. Marcus Loesch
Daimler AG
71059 Sindelfingen

Dear Mr. Loesch:

Thank you for your letter dated August 9, 2013, on behalf of Mercedes Benz (Mercedes), which requested EPA approval for a maintenance interval equivalent to the service interval (oil change interval) for the Diesel Exhaust Fluid (DEF) refill for Selective Catalytic Reduction (SCR) emission control systems pursuant to 40 CFR 86.1834-01 (b)(7)(ii). Specifically, your request is applicable to Sprinter chassis certified heavy-duty diesel vehicles for Model Year (MY) 2014. Subject to the conditions in this letter, we approve the maintenance interval equal to the estimated driving range of 4800 to 9000 miles for 2014 Sprinter chassis certified heavy-duty diesel vehicles. The approved estimated ranges are by described body style and engine as explained in the "Request for approval of new scheduled maintenance under § 86.1834-01 (b) (7)(ii)) for Model Year 2014 Spirnter vehicles" dated 8/09/21013.

Your letter states that the required DEF refill maintenance for the SCR is a new technology which did not exist prior to 1980. Your letter indicates that Mercedes will use SCR emissions control systems on Sprinter chassis certified heavy-duty diesel vehicles to help meet the NOx standards. To maintain performance and emissions compliance through successful operation of this technology, frequent DEF refills are required. You have stated that to meet a 100,000 mile allowable service interval, the DEF storage tank for you vehicles would need to be on the order of 85 gallons, and would require more vehicle space to package such a tank than is possible to accommodate with your vehicle applications. You have stated that a larger tank necessary to meet a longer service interval is an unrealistic scenario because of limited vehicle architecture space and associated excess weight.

Based on the information Mercedes has provided , EPA believes that its chassis certified heavy-duty diesel Sprinter trucks do not yet have the carrying and storage capacity required for the quantity of DEF needed to satisfy an allowable service interval longer than that requested by Mercedes.

After reviewing your request, EPA believes that longer refill intervals than that requested by Mercedes would require larger and heavier DEF tanks, and the information provided by Mercedes indicates that the requested DEF refill interval noted above approximates the maximum feasible maintenance intervals associated with reasonable DEF tank sizes. Based on

this information we believe the intervals noted above are warranted. Therefore, EPA is approving the maintenance interval for the SCR catalysts system that Mercedes requested for their Sprinter chassis certified heavy-duty diesel, i.e., that the maintenance interval be equivalent to 4800 to 9000 miles of driving range, dependent upon engine and body style. This approval is limited to the 2014 Model Year Sprinter chassis certified heavy-duty diesel vehicle.

Please contact Mr. Joel Ball of my staff at (734) 214-4238 if you have any questions about the decisions set forth in this letter.

Sincerely,

Linc Wehrly, Director
Light-Duty Vehicle Center
Compliance Division