

Legal Notes

Replacement of a current Emission Tier engine

If the original engine being replaced is a current emission tier engine (Tier 4 Final for diesel and Tier 3 for gas), order a replacement engine using Regular Parts order. See DPB-2018-002 (diesel engines) and DPB-2018-025 (gas engines) for a list of current tier engines that can be ordered on Regular Parts order.

Replacement of a previous Emission Tier or pre-regulation engine

In order to comply with EPA and CARB emissions regulations 40 CFR 1068.240 and 13 CCR 2423(j), dealers must confirm engine specific information and disposition of the original engine being replaced by submitting the required information and destruction photos through the Kubotalink Replacement Engine Request as outlined in this bulletin.

Maximum penalties for non-compliance are shown as follows for educational purposes only. The penalty fine is \$42,500 x days in service x number of engines. Example: \$42,500 x 1095 days x 2 engines = \$93,075,000. This example is based on the EPA audit going back three years and finding 2 engines that slipped past the destruction/possession clause by mistake.

The engine block is the controlled component in the EPA process to ensure that compliance is maintained. Therefore, if a customer or dealer wanted to keep other parts from the original engine, this is allowable, provided that the engine block is destroyed as described in this bulletin.

Before destroying a block, the dealer may want to check the Kubota inventory to minimize customer down time in cases where the original engine is still operational.

If the original engine CANNOT be replaced with the current Tier engine (configuration or operating characteristics are NOT the same), then the replacement engine must follow the below scheme:

EPA/CARB Regulation

Original Engine	Replacement Engine
Pre-regulation	Pre-regulation / Tier 1 / Tier 2 / Tier 3 / Interim Tier 4 / Tier4
Tier 1	Tier 1 / Tier 2 / Tier 3 / Interim Tier 4 / Tier 4
Tier 2	Tier 2 / Tier 3 / Interim Tier 4 / Tier 4
Tier 3	Tier 3 / Interim Tier 4 / Tier 4
Tier 4i	Interim Tier 4 / Tier 4
Tier 4 Final	Tier 4 Final only