

Recommend Application Format

for

Certification of Off-highway Motorcycles and All-terrain Vehicles

**ATV/OFMC Workshop, July 2004
EPA/CARB**

A Joint EPA/CARB Application Format



Recommend Application Format

- **Part A. Common Information**

- **Part B. Individual Engine Family Application**
 1. 1. Request for Certification
 2. 2. Correspondence and Communications
 3. 3. Data Summary Sheet (DSS)
 4. 4. Application Requirements (40 CFR §1051.205 (a) to (s))
 5. 5. Averaging, Banking, and Trading (ABT) Requirement
 6. 6. Additional California Requirements (Reserved)

Part B. Individual Engine Family Application

Section 1. Request for Certification:

Information to be Included:

- Manufacturer's legal name
- Name of the engine family and its vehicle category
- Compliance statements
- Primary certification contact information
- Signature of an authorized company representative.

Advice for Submittal:

- Cover letter format
- Identify primary contact by "For questions call..."

Part B. Individual Engine Family Application

Section 2. Correspondence and Communications

Information to be Included:

- Information for all persons authorized to be in contact with EPA/CARB
- One primary company email address for receiving official documents.
- U.S. mail address

Advice for Submittal:

- Supply complete contacts list in Part A.
- Create an email address: certificate@company.com, or Company-cert@xxx.com to receive EPA/CARB documents.

Part B. Individual Engine Family Application

Section 3. Data Summary Sheet (DSS)

- DSS is a summary of the certification information for a specific EF
- At this time, complete the DSS template (*In the future, the DSS will be generated from the information you entered into EPA's database*)
- DSS is comprised of 7 sections.
 1. General Information
 2. EPA/CARB Emission Standards and Certification Levels
 3. Engine Family Description
 4. Exhaust Emission Control Information
 5. Exhaust Emission Data Vehicle and Test Data
 6. Permeation Emissions Control and Test Data
 7. Models Covered

Part B. Section 4 (a): Engine Family Description

Information to be Included:

- Engine family name
- Vehicle categories
- Any new technology applied
- Fuel type
- EF specifications
- Models covered

Advice for Submittal:

- Refer to appropriate sections on the DSS for required information
- May choose to provide a separate table for CA models

Part B. Section 4 (b):

Emission Control Systems and Auxiliary Emission Control Devices

Information to be Included:

- Exhaust emission controls
- Evaporative/permeable emission controls
- AECD information

Advice for Submittal:

- Refer to the DSS for the required information, when applicable
- Use schematics, tables and lists
- Place common information in Part A
- For CBI:
 - make a CBI file and a public file:
 - CBI_EF name.pdf
 - FOI_EF name.pdf
 - create a CBI code in public file and describe the code in the CBI file
 - both files must be submitted concurrently

Part B. Section 4 (c):

Emission Data Vehicle (EDV) Description

Information to be Included:

- Explanation for EDV selection
- EDV specifications
- Test related information

Advice for Submittal:

- Refer to appropriate sections on DSS for the required information

Part B. Section 4 (d):

Alternate or Special Test Procedure Description

Information to be Included:

- Descriptions of any special or alternate test procedures and/or special test equipment

Advice for Submittal:

- Must obtain advanced EPA/CARB approvals
 - include a copy of the approval, or
 - provide the approval number, if any
- Place common information in Part A

Part B. Section 4 (e):

Durability Test Procedure Description

Information to be Included:

- Description of the durability procedure
- DDV test information, if deferent than EDV
- DF data type:
 - new
 - carry-over
 - EPA assigned DFs for SVM

Advice for Submittal:

- Refer to appropriate section on DSS for the required information
- Place common information in Part A
- If new DF data is not provided:
 - explain reasons
 - identify the source of the data

Part B. Section 4 (f): Test Fuel Specifications

Information to be Included:

- Exhaust and evaporative test fuel specifications

Advice for Submittal:

- Provide an item-by-item comparison list
- Place common information in Part A

Part B. Section 4 (g):

Useful Life (UL) of the Engine Family

Information to be Included:

- The useful life of the EF
 - **EPA:** minimum UL: 10,000 km/1,000 hr/5yr, different ULs are allowed
 - **CARB:** 10,000 km/5yr
No 1,000 hr
No alternative UL allowed.

Advice for Submittal:

- Please note CARB's UL rule and provide separate CARB DFs calculations when necessary

Part B. Section 4 (h):

Maintenance and User Instructions

Information to be Included:

- ▶ Maintenance and user instructions as specified in **40 CFR §1051.125**

Advice for Submittal:

- ▶ make a table to list all parts that are emission related, indicate maintenance schedule (if any) and sources for the parts and repairs;
- ▶ submit owner's manuals for your new vehicles/engines when available; or
- ▶ provide EPA web accessibility to your owner's manuals.

Part B. Section 4 (I):

Emission-Related Installation Instructions

(Only if you sell engines for others to install in an ATV/OFMC)

Information to be Included:

- ▶ Proposed emission-related installation instructions as specified in 40 CFR §1051.130

Advice for Submittal:

- ▶ Discuss with EPA/CARB before submitting application, if any concerns arise

Part B. Section 4 (J):

Vehicle Emission Control Information (VECI) Label

Information to be Included:

- ▶ Proposed VECI label

Advice for Submittal:

- ▶ Require advanced approval if proposing changes to VECI specifications in 40 CFR §1051.135(c)
- ▶ Submit a photocopy of same size as the actual label
- ▶ May place the complete set of VECI labels for a model year in Part A.

Part B. Section 4 (k): Emission Data

Information to be Included:

- ▶ Exhaust data:
 - HC, NO_x, HC+NO_x and CO before and after DFs
- ▶ Permeation data:
 - HC before and after DF

Advice for Submittal:

- ▶ Reference appropriate DSS section(s) for the information
- ▶ If new emission data is not provided, provide:
 - explain the reasons; and
 - identify the sources of data.

Part B. Section 4 (I): Report All Test Results

Information to be Included:

- ▶ All certification tests related information

Advice for Submittal:

- ▶ Keep in file for at least 5 years
- ▶ Provide to EPA/CARB upon request, unless otherwise specified in other sections of the guidance

Part B. Section 4 (m): Deterioration Factors (DFs)

Information to be Included:

- ▶ List of DFs for each regulated pollutant.
- ▶ Data used in developing the DFs.
- ▶ Detailed description of alternative DF procedure, if any.

Advice for Submittal:

- ▶ Require advanced approvals for any alternative durability procedure.
- ▶ Reference appropriate DSS sections for information required
- ▶ Place common information in Part A

Note: Separate DF calculations and DF(s) for EPA certificate and California EO may be required.

Part B. Section 4 (n):

Adjustable Operating Parameters and Other Adjustments

Information to be Included:

- ▶ As specified in 40 CFR §1051.115 (c) and (d)

Advice for Submittal:

- ▶ Organize the required information by a table (example provided)
- ▶ Place common information in Part A.

Part B. Section 4 (o):

Statement of Compliance – Test Vehicles

Information to be Included:

- ▶ As specified in 40 CFR §1051.205 (o)

Advice for Submittal:

- ▶ May provide all compliance statements in the cover letter.

Note: Separate statements, referencing EPA and CARB procedures and requirements respectively, are required.

Part B. Section 4 (p):

Statement of Compliance – Engine Family

Information to be Included:

- ▶ As specified in 40 CFR §1051.205 (p)

Advice for Submittal:

- ▶ May provide all compliance statements in the cover letter

Note: Separate statements, referencing EPA and CARB procedures and requirements respectively, are required.

Part B. Section 4 (q): Projected U.S./California Sales

Information to be Included:

- ▶ Projected total US sales and CA-only sales
- ▶ Sales of competition models, if included in the FEL

Advice for Submittal:

- ▶ For confidential treatment, submit the table in the CBI file

Part B. Section 4 (r): Emission Sampling Method

Information to be Included:

- ▶ Method to modify production vehicles for measuring emissions in the field

Advice for Submittal:

- ▶ Submit the required information to EPA/CARB upon request

Part B. Section 4 (s): Other Information

Information to be Included:

- ▶ Compliance phase-in plan
- ▶ Fee Filing Form
- ▶ CARB EO (for CA-only certification)
- ▶ Any additional information that may help to evaluate your application

Advice for Submittal:

- ▶ The Phase-in plan must show projected compliance
- ▶ Place the phase-in plan in Part A
- ▶ For confidential treatment, submit confidential info in CBI file.

Part B. Section 5: ABT Requirements

(Only if you use ABT to show compliance)

Information to be Included:

- ▶ Compliance statements for ABT
- ▶ Detailed ABT calculations

Advice for Submittal:

- ▶ Use table format to organize data, sample provided
- ▶ Place the ABT form in Part A
- ▶ For confidential treatment, submit both CBI file and public file

CARB:

no banking and trading

use CA-only sales for averaging

require a separate CARB averaging compliance plan

Part B. Section 6. Additional California Information

(Reserved)

**Your comments are valuable for EPA/CARB
to finalize the application format!**

Please send your comments to:
Chen.Emily@EPA.gov by 8/27/04

Thank you for coming!