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# **Major Steps of Certification and Compliance**

for

2006 and Later Model Year ATVs and OFMCs

**ATV/OFMA Workshop, July 21, 2004**

**EPA/CARB**

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# Major Steps of Certification and Compliance

## Pre-Certification Requirements

1. Register with EPA ( for New MFR)

2. Group Products into Engine Families

3. Conduct Durability and Emissions Tests

4. Prepare Application & Data Summary Sheet

5. Submit Appropriate Certification Fees

6. Submit Application Package

## Post -Certification Requirements

7. Build Vehicles to Certified Specifications

8. Label Each New Vehicle/Engine

9. Conduct Production Line Tests, if required

10. Submit Amendments to Application

11. Submit Required Reports

12. Provide Maintenance Instructions and Warranty Service, Submit DRs and Conduct Recalls

# Step 1. Register with EPA

- ▶ **Send a Manufacturer Registration Letter**
  - Provide a brief description of your company and your certification plan; include answers to List of Questions in Attachment 1
  - Send to EPA and CARB
- ▶ **Fill out the Manufacturer Code Entry Form**
  - Access [www.epa.gov/otaq/cfeis.htm](http://www.epa.gov/otaq/cfeis.htm), download the form
  - Fill out and send it back to EPA via email: [omscfeis@epa.gov](mailto:omscfeis@epa.gov)

# Step 2. Group Products into Engine Families

- ▶ **Group vehicles/engines into Engine Families (EFs) based on emission characteristics (40 CFR §1051.230)**
  - Combustion cycle
  - Cooling system
  - Fuel system
  - Method of air aspiration
  - Catalytic converter
  - Fuel
  - Approximate bore diameter
  - Evaporative emission controls
- ▶ **Name an EF:**

Character Position	1	2	3	4	5	6	7	8	9	10	11	12
EF Name Example	6	B	A	C	X	.	1	2	5	D	6	F
Sequence	MY	Three letter MFR code assigned by EPA			Vehicle category	Displacement				MFR specified code		

# Step 3. Conduct Emissions Tests to Demonstrate Compliance

## 1 of 2 - Exhaust emissions

- **Demonstrate compliance:**

- Certification level  $\leq$  applicable standard for each and every regulated pollutant

Where:

Certification level = Emission value at vehicle's end-of-useful life

= low operating hour emission x DF (with catalyst converter), or

= low operating hour emission + DF (w/o catalyst converter)

- **Procedure:**

- Select one Emission Data Vehicle (EDV) from each EF
- Conduct service accumulation to stabilize emissions
- Test to determine DF for each regulated pollutant
- Test to determine emission value at a low operating hour for each regulated pollutant

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## **Step 3. Conduct Emissions Tests to Demonstrate Compliance 2 of 2 - Evaporative/Permeation Emissions**

- **Two methods may be used to show permeation emissions compliance:**
  - ▶ Emission Testing - 40 CFR §1051.515
  - ▶ Certify-by-Design - 40 CFR§1051.245(e)
  
- **No crankcase evaporative emissions allowed**

## Step 4. Prepare a Complete Application Package

### Application Package (PDF format):

▶ Application (Text content)

- Request for Certificate with authorized signature
- Complete content of application
- A Fee Payment Form
- California E.O., if certifying for “California-only” EF

▶ Data Summary Sheet (DSS) (Database printout sheet)

- Prior to EPA/CARB computer system is ready, use an interim Data Summary Sheet (a data input file in MS Excel format) and the DSS template.

## Step 5. Pay Appropriate Certification Fees

- ▶ Payment is required in advance of any EPA certification service
- ▶ \$ amount may change:
  - \$826 per EF per MY (Effective 7/12/04 to 12/31/05)
  - check [www.epa.gov/otaq/fees.htm](http://www.epa.gov/otaq/fees.htm) for updated fee schedule
- ▶ Payment procedure: EPA Guidance CCD-04-14
- ▶ Fee Payment Form and instructions:
  - downloadable from the same website as above

*Note: Must also pay full certification fee for “CA-only” certificate*



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## Step 6. Submit Application Package

▶ **Three procedures:**

- **50 States:** Submit to EPA & CARB concurrently
- **49 States:** Submit to EPA only
- **CA only:** Submit to CARB first; receive CARB EO; finally, submit the application with EO to EPA

▶ **Electronic submission is required**

- Email or mail (e.g. on a CD-Rom)
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## Step 7. Build Vehicles to Certified Specifications

**Manufacturers must assure that the production vehicles or engines are within the scope of an issued certificate, with respect to:**

- Materials
- Engine & drivetrain design
- Fuel system
- Emission control system components and strategies
- Exhaust after-treatment devices; or
- Any other device and component that may influence emissions

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## Step 8. Label Each New Vehicle/Engine

- ▶ **VIN** : Vehicle Identification Number
  - ▶ **VECI**: Vehicle Emission Control Information label
  - ▶ **NER**: Normalized Emission Rate
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## **Step 9. Conduct Production Line Test, if Required**

- ▶ **Must perform Production Line Test (PLT) for an EF participating in ABT and certified to a Family Emission Limit (FEL)**
  - ▶ **PLT Procedure: 40 CFR Part 1051, Subpart D**
  - ▶ **Must submit failure reports & periodic reports by specified deadlines**
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# Step 10. Submit Amendments to Application

- ▶ **Must submit amendments to EPA before taking action:**
  - Add a new configuration
  - Modify a FEL
  - Make any changes that may affect emissions

***Note:***

***CARB does not allow modifying FEL after certification.***

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## **Step 11. Submit Required Reports**

**For example:**

- ▶ **End-of-model year phase-in report**
  - ▶ **End-of-model year ABT report**
  - ▶ **Failure and Periodic reports for PLT**
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## **Step 12. Provide Maintenance Instructions and Warranty Service, Submit DR and Conduct Recalls**

- ▶ Maintenance Instructions**
  - ▶ Warranty Requirements**
  - ▶ Defect Reports and Recalls**
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# Summary

- ▶ **Manufacturer is responsible for pre- and post-certification requirements to assure the vehicles are in compliance for the full useful life**
  - ▶ **EPA will conduct additional tests to verify compliance and provide assistance in your compliance process.**
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