



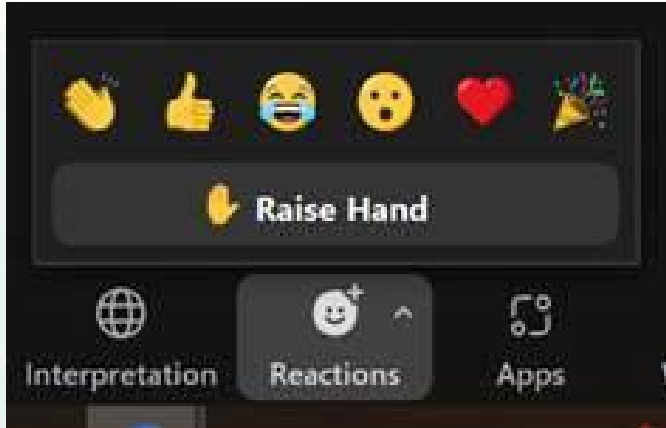
CALIFORNIA
AIR RESOURCES BOARD

**Proposed Amendments to the “Procedures
for Exemption of Add-On and Modified
Part(s) for On-Road Vehicles/Engines”**

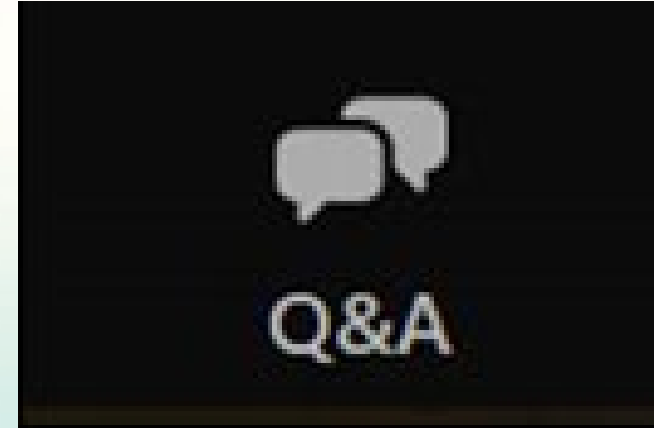
Public Workshop

September 17, 2024

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Workshop Agenda

- Opening Remarks
- Background
- Staff Proposals:
 - Application Submission Requirements
 - Test Vehicle or Engine Selection
 - Conditional Exemption
 - Labeling Requirements
- Next Steps
- Q&A

Background

- The anti-tampering provisions of the California Vehicle Code Section 27156 and Section 38391 prohibit add-ons and modifications that may impact emission performance or design, unless:
 - Add-ons and modifications have no adverse impacts, and
 - Add-ons and modifications reviewed/exempted by the California Air Resources Board (CARB)
- Aftermarket evaluation procedures detail the process for approval



Current Aftermarket Evaluation Procedures

- “Procedures for Exemption of Add-On and Modified Part(s) for On-Road Vehicles/Engines”(Procedures):
 - Adopted in 2021 and took effect in 2022
 - Amended in 2023 with changes specific to EV conversion
- The Procedures apply to a wide variety of components or devices that are not part of the vehicles or engines when they were originally certified



Proposed Amendments

- Application submission requirements
 - Provide alternative paths to prepare and organize applications for select categories/products
 - Clarify application information requirements
- Adding an alternative path for test vehicle or engine selection
 - Allow “characteristic” test vehicle or engine in lieu of “worst case” vehicle or engine
- Conditional exemption
 - Add new provisions for conditional exemption
- Labeling requirements
 - Submit a representative sample drawing of the label for each application
 - Change CARB exemption executive order (EO) numbering system
- Other changes to streamline and clarify application process

Current Requirements: Application Submission

- Exemption applications, excluding Category I and Category X applications, must be prepared and organized according to the criteria: single original equipment vehicle or engine manufacturer, same vehicle or engine class, same engine configuration, same fuel type, same emissions control technologies, and same emission standards.
- Overview of Current Application Process:
 - **Step 1:** Application Submission
Manufacturers select the appropriate category type, and then organize and submit application based on Section III of the Procedures
 - **Step 2:** Application Review
CARB staff review product information, vehicle or engine coverage list, and emission tests and OBD test results (if applicable) according to Sections IV through VI of the Procedures
 - **Step 3:** Executive Order(s) issuance or close out

Proposed Amendments: Application Submission Requirements

Proposal:

- Provide alternative path to prepare and organize applications for select categories/products:
 - Allow inclusion of multiple emission standards in an application for Category II through Category VIII devices, such as:
 - LEVIII ULEVs (LEVIII ULEV 50, LEVIII ULEV 70, LEVIII ULEV 125) may be combined
 - LEVIII SULEVs shall not be combined with LEVIII ULEVs
 - Only vehicles within same generation of LEV regulations may be combined, e.g., LEV III vehicles shall not be combined with LEV II vehicles
 - Other criteria, single OEM, same vehicle or engine class, same engine configuration, same fuel type, same emissions control technologies, remain applicable

Proposed Amendments: Application Submission Requirements (cont.)

Proposal (cont.):

- Additional changes to application submission requirements in Section III(d) of the Procedures for select categories/products:
 - Clarify the requirements for select products which replace the complete engine and emission control technologies
 - Clarify requirements for select products without any potential capability to alter or modify ECM calibration that could affect exhaust or evaporative emissions or the OBD system
- Provide additional clarifications on application submission

Current Requirements: Test Vehicle Selection

- Manufacturers must perform testing on the “worst case” vehicle or engine, which is determined by the Executive Officer based on test vehicle or engine selection criteria.
 - (1) Applicable emission standards
 - (2) Highest percentage of the new vehicle or engine certification emission results compared to the applicable emission standards
 - (3) Vehicle test weight and road or engine dynamometer loading
 - (4) Extent of modification and related effects
- Emissions evaluation compliance options:
 - (1) Comparison against applicable emission standards
 - (2) Comparison against baseline emission levels

Proposed Amendments: Test Vehicle Selection Requirements

Proposal:

- In addition to the current path, allow “characteristic” test vehicle or engine in lieu of “worst case” vehicle or engine
 - Establish “characteristic” vehicle or engine selection criteria:
 - (1) Meet the most stringent on-board diagnostic requirements
 - Most comprehensive OBD requirements
 - Lower OBD emission thresholds
 - Most recent OBD communication protocols
 - Most frequent monitoring requirements (higher In-Use-Monitor Performance Ratio)
 - (2) Have the greatest extent of modification and related effect
 - Horsepower increase
 - Boost increase
 - Number of stock components modified or replaced
 - Stock sensors impacted
 - The evaluation criteria for the “characteristic” vehicle or engine will be comparative emissions testing

Proposed Amendments: Conditional Exemption

Current:

- An exemption executive order is issued based on an application that meets all the requirements of the Procedures.

Proposal:

- Add a path for a conditional exemption to allow earlier introduction of products into market
 - Conditional exemption requirements:
 - (1) The applicant must hold a valid CARB exemption EO for the same product
 - (2) Only one conditional exemption will be issued for a product at any given time
 - (3) Conditional exemption cannot be used as the basis for Category I applications
 - (4) Conditional exemptions cannot be the basis for additional conditional exemptions

Proposed Amendments: Conditional Exemption (cont.)

Proposal (cont.):

- Conditional exemption requirements (cont.):
 - (5) Besides the general application submission requirements, the conditional exemption application includes specific additional information
 - (6) A conditional exemption expires 18 months from the date of issuance
 - (7) Manufacturers must keep records of all products sold under the conditional exemption
 - (8) Manufacturers must complete the requirements set forth in the Procedures to obtain full exemption EO before the expiration of the conditional exemption.
- If it is determined that the product will reduce the effectiveness of emissions control system, negatively impact OBD system or exceed emission standards:
 - (1) Conditional exemption will be revoked
 - (2) Products sold under conditional exemption are subject to recall

Proposed Amendments: Labeling Requirements

Current Requirements:

- Manufacturers with a previously issued exemption Executive Order must include an actual physical label with the first application submission of each calendar year

Proposal:

- Remove the requirement for submitting physical label
- A representative sample drawing of label must be submitted for each application

Proposed Amendments: Labeling Requirements (cont.)

Current Requirements:

- The product information label shall contain CARB Executive Order number using the format "CARB D-XXX" or "CARB B-XXX"

Proposal:

- Introduce an improved CARB EO numbering system for streamlined lookup:

- EV Conversion: **B-XXXX-XXX-XXX**

- Other products: **D-XXXX-XXX-XXX**

Manufacturer code Device code Sequential number

- Staff is soliciting ideas for proper labeling of products sold under conditional exemptions
 - How will these products be identified in-field?
 - How to indicate that the product got full EO?

Next Steps

- Consider stakeholder feedback:
 - Submit written comments through September 30, 2024
 - Potential follow-up discussion with stakeholders
- Evaluate costs and benefits of the proposal
- Finalize rulemaking package
- Board hearing

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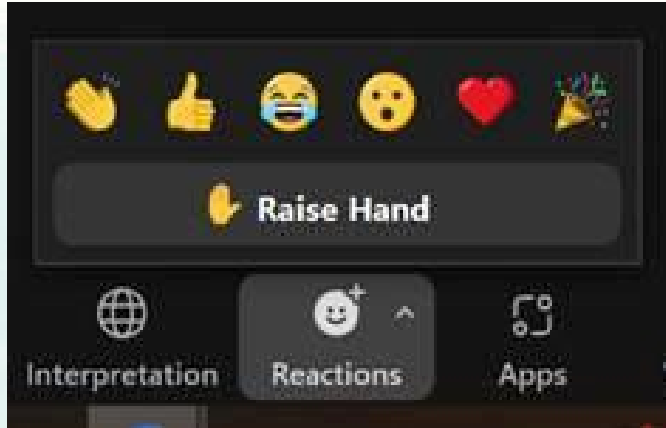
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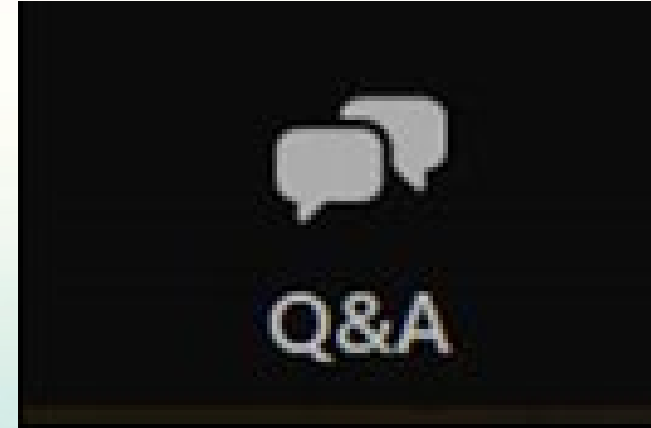
- **CARB Aftermarket Program website:**

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Q&A



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