



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OCT 24 2006

OFFICE OF  
AIR AND RADIATION

CISD-06-19 (LDV, LDT, MDPV, HDV, HDE)

Dear Manufacturer:

**SUBJECT:** New Examples of Vehicle Emission Control Information (VECI) Labels  
and Heavy-Duty Engine Labels

This letter provides new examples of vehicle labels for manufacturers of light-duty vehicles (LDVs), light-duty trucks (LDTs), medium-duty passenger vehicles (MDPVs), and heavy-duty vehicles (HDVs) between 8,500 and 14,000 pounds gross vehicle weight. It also provides an example of a heavy-duty engine (HDE) label.

Background

Changes to EPA vehicle labeling requirements in 40 CFR §86.1807-01 and engine labeling requirements in 40 CFR §86.098-35 were published in a direct final rule published in the Federal Register dated December 8, 2005 at 70 FR 72923. These actions took effect on February 6, 2006.

The final rule erroneously added paragraph (j) to the engine labeling requirements in §86.098-35 instead of to the labeling requirements in §86.007-35. EPA will add paragraph (j) to §86.007-35 to allow flexibility for labels of future heavy-duty engines certified under Subpart A. EPA is considering making other modifications to the labeling section of Subpart A in a future rulemaking.

Discussion

The changes made to the labeling sections of the regulations were designed to improve the clarity and usefulness of the VECI label. Much of the language in 40 CFR §86.1807-01 dates from pre-catalyst automotive technology of approximately 30 years ago. Therefore, a number of the requirements for information on the label are no longer relevant for modern vehicles. Specifically, changes in the vehicle labeling requirements have eliminated the need for printing the word "Catalyst" in large font on the label, eliminated the need for a hose routing diagram, eliminated the need for displaying tune-up specifications, and eliminated the need for the SAE J1892 "Recommended Practice for Bar-Coded Vehicle Emission Configuration Label," which was previously waived by the California Air Resources Board in Mail-Out #MSO 2002-06.<sup>1</sup> The vehicle labeling requirements in §86.1807-01 were also updated to include specific

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<sup>1</sup> SAE J1892 should not be confused with SAE J1877 "Recommended Practice for Bar-Coded Vehicle Identification

reference to the MDPVs and HDVs less than 14,000 pounds GVW. The MDPV vehicle class was not included in all of the appropriate paragraphs of the vehicle labeling section when Tier 2 emission standards were published for MDPVs in 2000. Similarly, some paragraphs did not include reference to HDVs when revised engine and chassis standards were published for HDVs and heavy-duty engines in 2001.

Paragraph (g) in §86.1807-01 was reworded to clarify that alternative label formats consistent with the requirements and intent of the labeling section may be approved in advance by the Administrator. Paragraph (j) in §86.098-35, (and as it is to be added to §86.007-35) requires manufacturers to obtain advance EPA approval for alternative labels for heavy-duty engines.

Although the changes to §86.1807-01 do not require explicit display of standards, e.g. identifying a light-duty truck as a Tier 2 Bin 5 LDT3, EPA encourages manufacturers to display such information on the label. EPA also encourages manufacturers to identify vehicles which are certified to federal OBD II requirements as opposed to California OBD II requirements. With respect to California labeling requirements, also note that the example labels attached to this letter show emission control system names using definitions in California Code C.3.3.2(a).

One manufacturer asked for clarification that the removal of paragraphs (c)(2) and (c)(3) did not require a second VECI label to be placed near the Department of Transportation safety label. This is the correct interpretation.

The California Air Resources Board adopted the EPA changes to their vehicle regulations on June 22, 2006. They have also adopted the addition of paragraph (j) in §86.007-35 to their Otto cycle gasoline heavy-duty engine labeling requirements. The addition of paragraph (j) to their diesel cycle heavy-duty engine labeling requirements is expected to occur in the next several months. In the interim, manufacturers should discuss with CARB the acceptability of alternative heavy-duty engine labels.

#### Examples of Acceptable Label Formats

The attached Excel spreadsheet has 10 examples of acceptable label formats. Examples 1 through 9 show suggested formats and content for VECI labels which reflect the recent changes to §86.1807-01. Examples of suggested terminology and explanation of acronyms for the labels is presented in Attachment 10. Vehicle labels include engine displacement in the 6<sup>th</sup> through the 9<sup>th</sup> characters of the test group name, and therefore with the exception of test groups which contain more than one engine displacement, the test group name will suffice for an explicit display of engine displacement. Test groups with more than one engine displacement should display the exact engine displacement of the vehicle in question. It is important to note that the content and format of these labels represent just one set of example labels. Attachments 1-9 do not display all types of label possibilities. For example, manufacturers of incomplete chassis certified vehicles less than 14,000 pounds GVW and manufacturers of heavy-duty engines may need other label types. Additionally, all heavy-duty engine labels must also list the particular

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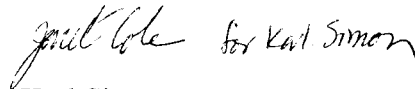
Number Label." Although the vehicle identification number (VIN) is not required to be printed on the VECI label, paragraph (f) in §86.1807-01 establishes that the VIN bar code, wherever it appears on the vehicle, shall comply with SAE recommended practice J1877.

model of the engine to which the label is attached.

As stated previously, alternative vehicle and engine label content and formats may be accepted if approved in advance by the Administrator. Please submit any approval requests to your designated EPA certification representative.

If you have questions concerning this letter please contact your EPA certification representative or Martin Reineman at 734-214-4430, or by e-mail at [reineman.martin@epa.gov](mailto:reineman.martin@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Karl Simon" followed by "for Karl Simon" in a smaller, less legible script.

Karl Simon  
Acting Director  
Compliance and Innovative Strategies Division

Enclosure

VECI Label Example  
50 State Passenger Car

<i>Company's Trustmark</i>	<i>Company's Name</i> <b>VEHICLE EMISSION CONTROL INFORMATION</b>	
<b>Conforms to regulations:</b>		<u>2008 MY</u>
<b>U.S. EPA:</b>	<u>T2B3 LDV</u>	<b>OBD:</b> <u>II</u> <b>Fuel:</b> <u>Gasoline</u>
<b>California:</b>	<u>SULEV II PC</u>	<b>OBD:</b> <u>II</u> <b>Fuel:</b> <u>Gasoline</u>
No adjustments needed.		TWC/HO2S/EGR/SFI/AIR
Group:8VEHV02.3ABC Evap:8VEHXR0120ABC		<i>Part # Bar Code Here</i> Label Part Number

**VECI Label Example  
50 State Medium Duty Vehicle**

<b>Company's Trustmark</b>	<b>Company's Name</b>	
<b>VEHICLE EMISSION CONTROL INFORMATION</b>		
<b>Conforms to regulations:</b>		<u>2008 MY</u>
<b>U.S. EPA:</b>	<u>IT2B9 LDT4</u>	<b>OBD:</b> <u>II</u> <b>Fuel:</b> <u>Gasoline</u>
<b>California:</b>	<u>LEV II MDV6</u>	<b>OBD:</b> <u>II</u> <b>Fuel:</b> <u>Gasoline</u>
<b>No adjustments needed.</b>		<b>TWC/HO2S/EGR/SFI</b>
Group:8VEHT04.0ABC Evap:8VEHR0220ABC	<b>Part # Bar Code Here</b>	Label Part Number

**VECI Label Example  
50 State Cleanest Vehicle**

<i>Company's Trustmark</i>	<b>Company's Name</b> <b>VEHICLE EMISSION CONTROL INFORMATION</b>	
<b>Conforms to regulations:</b>		<u>2008 MY FFV</u>
<b>U.S. EPA:</b>	<u>IT2B9 LDT2</u>	<b>OBD:</b> <u>II</u> <b>Fuel:</b> <u>Gasoline/Ethanol</u>
<b>California:</b>	<u>Certified for sale</u> <u>ULEV qualified</u>	<b>OBD:</b> <u>II</u> <b>Fuel:</b> <u>Gasoline/Ethanol</u>
No adjustments needed.		TWC/HO2S/EGR/SFI
Group:8VEHT04.0ABC Evap:8VEHR0220ABC		<b>Part # Bar Code Here</b> Label Part Number

VECI Label Example  
EPA Only

<i>Company's Trustmark</i>	<b>Company's Name</b> <b>VEHICLE EMISSION CONTROL INFORMATION</b>	
<b>Conforms to regulations:</b>		<u>2008 MY</u>
<b>U.S. EPA:</b>	<u>T2B5 LDV</u>	<b>OBD:</b> <u>II</u> <b>Fuel:</b> <u>Gasoline</u>
<b>California:</b>	<u>Not for sale in states with California emissions standards</u> <b>OBD:</b> <u>N/A</u> <b>Fuel:</b> <u>N/A</u>	
No adjustments needed.		TWC/HO2S/EGR/SFI
Group:8VEHT03.8ABC Evap:8VEHXR0165ABC		<i>Part # Bar Code Here</i> Label Part Number

VECI Label Example  
California Only

<i>Company's Trustmark</i>	<b>Company's Name</b> <b>VEHICLE EMISSION CONTROL INFORMATION</b>	
<b>Conforms to regulations:</b>		<u>2008 MY</u>
<b>U.S. EPA:</b>	<u>For sale only in states with California emissions standards</u>	<b>OBD:</b> <u>N/A</u> <b>Fuel:</b> <u>N/A</u>
<b>California:</b>	<u>LEV II LDT2</u>	<b>OBD:</b> <u>II</u> <b>Fuel:</b> <u>Gasoline</u>
No adjustments needed.		TWC/HO2S/EGR/SFI
Group:8VEHT04.0ABC Evap:8VEHR0165ABC	<i>Part # Bar Code Here</i>	Label Part Number



**VECI Label Example  
Multiple Evap Families**

<b>Company's Trustmark</b>	<b>Company's Name</b>	
<b>VEHICLE EMISSION CONTROL INFORMATION</b>		
<b>Conforms to regulations:</b>		<u>2008 MY</u>
<b>U.S. EPA:</b>	<u>IT2B10 LDT4</u>	<b>OBD:</b> <u>II</u> <b>Fuel:</b> <u>Gasoline</u>
<b>California:</b>	<u>LEV II MDV6</u>	<b>OBD:</b> <u>II</u> <b>Fuel:</b> <u>Gasoline</u>
No adjustments needed.		TWC/HO2S/EGR/SFI
<b>EVAP:</b>	8VEHR0240ABC	Standard Fuel Tank: 26/27 gal
	8VEHR0240ABD	Option Fuel Tank: 35.7 gal
Group:8VEHT05.8ABC	<b>Part # Bar Code Here</b>	Label Part Number

**VECI Label Example  
50 State Heavy Duty Vehicle**

<i>Company's Trustmark</i>	<b>Company's Name</b>	
<b>VEHICLE EMISSION CONTROL INFORMATION</b>		
<b>Conforms to regulations:</b>		<u>2008 MY</u>
<b>U.S. EPA:</b>	<u>HDV</u>	<b>OBD:</b> <u>II</u> <b>Fuel:</b> <u>Gasoline</u>
<b>California:</b>	<u>LEV II MDV6</u>	<b>OBD:</b> <u>II</u> <b>Fuel:</b> <u>Gasoline</u>
<b>No adjustments needed.</b>		<b>TWC/HO2S/SFI</b>
Group:8VEHK05.4ABC Evap:8VEHR0265ABC	<b>Part # Bar Code Here</b>	<b>Label Part Number</b>

**VECI Label Example  
50 State Heavy Duty Vehicle - Incomplete**

<b>Company's Trustmark</b>	<b>Company's Name</b>	
	<b>VEHICLE EMISSION CONTROL INFORMATION</b>	
	Weight limits refer to Emission Certification only. DO NOT EXCEED VEHICLE GVWR (See Owner Manual)	
<b>Conforms to regulations:</b>	<u>2008 MY Incomplete</u>	
<b>U.S. EPA:</b> <u>HDV</u>	<b>OBD:</b> <u>II</u>	<b>Fuel:</b> <u>Gasoline</u>
<b>California:</b> <u>LEV II MDV6</u>	<b>OBD:</b> <u>II</u>	<b>Fuel:</b> <u>Gasoline</u>
<b>Completed Vehicle Maximums:</b>	GVWR: <u>10,000# max.</u>	
CurbW: <u>6952# max.</u>	Frontal Area: <u>38.7 ft2 max.</u>	
No adjustments needed.	TWC/HO2S/SFI	
Group:8VEHK05.4ABC Evap:8VEHR0265ABC	<b>Part # Bar Code Here</b>	Label Part Number

**VECI & IEI Label Example  
50 State Heavy Duty Engine**

<i>Company's Trustmark</i>	<b>Company's Name</b>	
	<b>IMPORTANT ENGINE INFORMATION VEHICLE EMISSION CONTROL INFORMATION</b>	
<b>Conforms to regulations:</b>		<u>2008 MY</u>
<b>U.S. EPA:</b>	<u>HDE</u>	<b>OBD:</b> <u>EMD</u> <b>Fuel:</b> Gasoline For use only in HDV with GVWR above 14,000#.
<b>California:</b>	<u>HDE</u>	<b>OBD:</b> <u>EMD</u> <b>Fuel:</b> Gasoline For use only in HDV with GVWR above 14,000#.
Fuel Tank Capacity: <u>19 gal max.</u>		
Persons wishing to add fuel tank capacity beyond the maximum must meet the requirements of 40CFR 86.095-35 (g)(2).		
No adjustments needed.		TWC/HO2S/SFI
Model: X123 5.4L - Group:8VEHH05.4ABC Evap: 8VEHE0120ABC	<i>Part # Bar Code Here</i>	Label Part Number

## VECI &amp; IEI Label Entries

<b>Location on Label</b>	<b>Acceptable/Suggested Label Entries</b>									
Model Year/Type:	2008	2008 FFV	2008 NGV	2008 HEV	2008 Incomplete					
EPA Standards:	Tier 2	IT2Bx	T2Bx	HDV	HDE					
EPA Vehicle Class:	LDV	LDT	MDPV	HDV	LDT1	LDT2	LDT3	LDT4	HDV1	HDV2
EPA OBD:	CA II	F II	HD							
EPA Fuel:	Gasoline	Diesel	CNG	LPG	Gasoline/Ethanol		Hydrogen			
California Standards:	LEV II	ULEV II	SULEV II	PZEV	AT PZEV	ZEV				
California Vehicle Class:	PC	LDT	MDV	LDT1	LDT2	MDV6	MDV7			
California OBD:	CA II	EMD	HD							
California Fuel:	Gasoline	Diesel	CNG	LPG	Gasoline/Ethanol		Hydrogen			
Emissions Systems:	TWC/HO2S/UHO2S/EGR/SFI/AIR									
Test Group Name:	Group: 8XYZT02.3ABC									
Evap Family Name(s):	Evap: 8XYZR0120ABC									
Heavy Duty Engine:	Engine for use only in HDVs with GVWR above 14,000#					Engine for use in all HDVs				

**Notes:**

- 1) See label examples on example 3 for additional language for vehicles which qualify under California's "Cleanest Vehicle" Program.
- 2) See label examples on examples 4 and 5 for additional language for vehicles for sale in CA only, and in non-California states only.
- 3) See label example on example 8 for additional language for incomplete HDVs.
- 4) IT2Bx = Interim Non-Tier 2 Bins 1-10; T2Bx = Tier 2 Bins 1-10.
- 5) HDV1 = HDV with GVRW of 8501-10,000#; HDV2 = HDV with GVWR of 10,001-14,000#
- 6) CA II = CA approved OBD system; F II = Federal approved OBD system; EMD = Engine Manufacturer Diagnostic
- 7) Emission control systems names based on definitions in California C.3.3.2(a). Others to be developed as necessary.
- 9) Test groups with multiple engine displacements should list the displacements on the label.
- 10) Test groups with multiple evap families should be listed on the label with the distinguishing attribute, e.g. fuel tank size (see label example 6).
- 11) Through the 2008 MY, engine manufacturers may need to label the engine: Engine for use in all HDVs under 40 CFR 86.091-10(a)(3)(i)