

al/EPA

MAIL-OUT #96- 30



Pete Wilson Governor

James M. Strock Secretary for Environmental Protection

December 18, 1996

TO:

California Environmental Protection Agency



Air Resources Board Haagen-Smit Laboratory P.O. Box 8001 9528 Telstar Avenue El Monte, CA 91734-8001 ALL MANUFACTURERS OF UTILITY AND LAWN AND GARDEN EQUIPMENT ENGINES ALL OTHER INTERESTED PARTIES

SUBJECT Tamper-Resistance Requirements for Gaseous-Fueled Engines

The Air Resources Board (ARB) adopted emission regulations and incorporated test procedures for utility and lawn and garden equipment (ULGE) engines in March 1992. All California-sold ULGE engines produced at this time must be certified by the ARB. Certification includes demonstrating that any adjustable-engine parameters that affect emissions are designed with adequate tamper-resistance methods for inhibiting unauthorized in-use adjustments. In-use adjusting of the fuel-system parameters is allowed when the adjustments do not invalidate an engine's emissions compliance.

Fuel-system regulators and mixers used with gaseous-fueled (i.e., liquefied petroleum gas and natural gas) engines typically need in-use adjustments when compensating for varying fuel compositions and pressures. These fuel-system components have traditionally been equipped with in-use anti-tampering safety-related devices because these engines are required to satisfy existing non-ARB quality- and safety-certification requirements, such as those imposed by the Underwriters Laboratories, Inc. and the Canadian Gas Association. Consequently, the engine manufacturers have been reluctant to develop new, more complex, and expensive anti-tampering methods needed to satisfy the ARB requirements for such low-volume production components.

The ARB has always recognized the benefits of in-use engine parameter adjustments (See Mail-Out No. 92-06, issued July 7, 1992). The ARB also realizes that, while many of these equipment engines already comply with other non-ARB certification requirements, such compliance does not necessarily ensure compliance with the ARB emission requirements, or specifically, with the ARB anti-tampering requirements. (See Item No. 12, Mail-Out No. 95-30, issued September 14, 1995). However, recognizing that engine manufacturers would need additional leadtime to develop and implement acceptable, cost-effective tamper-resistance methods, the ARB has permitted certification of gaseous-fueled engine families in the 1996 calendar year on the condition that engine manufacturers continued to make good-faith efforts towards achieving complete compliance with the tamper-

resistance method requirements for the 1997 calendar year (See Item No. 8, Mail-Out No. 95-45, issued January 10, 1996).

In the past year, the Engine Manufacturers Association (EMA) has developed concepts of various tamper-resistance methods that provide flexibility in cost and design. The ARB has evaluated these concepts and preliminarily determined that many may be acceptable for use in actual practice. The results of these evaluations are described herein for the benefit of the entire gaseous-fueled ULGE engine industry.

The ARB will approve for use in production any of the concepts that are preliminarily determined to be acceptable subject to the following conditions:

I. Engine manufacturers are expected to utilize good engineering practice when incorporating any of the preliminarily accepted conceptual methods into their engine designs. The ARB will be checking on how successful an engine manufacturer is in implementing a concept by evaluating actual tamper-resistance method samples. However, evaluating every method that an engine manufacturer is using will not be necessary because the ARB believes that an engine manufacturer's ability to incorporate any of these concepts can be determined by evaluating the execution of only a single method. Accordingly, the ARB will randomly select only one tamper-resistance method from those used in the engine manufacturer's entire product line. Only one selection and evaluation will be conducted per engine manufacturer for each calendar year.

A manufacturer can facilitate this annual random evaluation by submitting a summary (e.g., tabular format, etc.) of tamperresistance methods used on engine family models that are expected to be certified for the current year and on models that were certified for the previous year. This summary should identify the specific anti-tampering method used on each engine model, and whether or not the particular method was previously evaluated and approved by the ARB. This summary should be submitted prior to the start of an engine manufacturer's "model-year" certification program (such as an attachment to the required letter of intent [Ref.: Section 14, Part I, Test Procedures of Mail-out No. 95-29, issued August 18, 1996]).

The anti-tampering method that has been specifically approved and any other acceptable methods used in production by an engine manufacturer that were not selected for evaluation, are not required to be reevaluated (or evaluated, as applicable) in later years if the approved method remains the same (i.e., the anti-tampering method(s) may be "carried over"). If the currently approved method is changed in later years, then the ARB may do another random selection in order to evaluate one of the tamper-resistance methods from those used in an engine manufacturer's entire product line. Engine manufacturers may request permission to "carry across" an approved tamperresistance method from one engine family to another engine family without an ARB evaluation.

- II. A previously approved tamper-resistance method may be reevaluated in later years if in-use surveillance, or other information, reveals that the method is failing to provide satisfactory in-use antitampering deterence.
- III. The ARB will evaluate the randomly selected anti-tampering method using the tamper-resistance provisions in Part I, Section 18(d), of the "California Exhaust Emission Standards and Test Procedures For 1995 and Later Utility and Lawn and Garden Equipment Engines," amended May 26. 1995 [Mail-out No. 95-29]). The methods will be evaluated to determine their ability to deter improper in-use adjustments. In making this determination, the ARB will consider whether the manufacturer makes information about procedures for circumventing and/or disabling an anti-tampering method generally availability. If such information is generally available. the ARB will find that these systems do not adequately deter tampering. Accordingly, engine manufacturers should not make information about circumventing or disabling a particular tamper resistance method available to unauthorized parties. This information should not be contained within the engine or equipment (as applicable) technical service manuals and owners' manuals.
- IV. An engine-family certification application must provide a description of the adjustable engine parameters and the anti-tampering method(s) used on the engine family models.

PRELIMINARILY ACCEPTABLE TAMPER-RESISTANCE CONCEPTUAL METHODS

1. <u>Aluminum Plug</u>

Aluminum plugs can be used to cover recessed adjustment screws on regulators and carburetors. The plug thickness is a function of the corresponding diameter; however, a minimum thickness of 0.060 inch is required. Plugs should be installed with a press-in operation that provides an interference fit. See Figure F-1, Attachment A.

2. <u>Steel Plug</u>

Steel plugs can be used to cover recessed adjustment screws on regulators and carburetors. The plug thickness is a function of the corresponding diameter; however, a minimum thickness of 0.030 inch is required. Plugs should be installed with a press-in operation that provides an interference fit. See Figure F-2, Attachment A.

3. Rubber, Plastic, and RTV Plug

Form-in-place and premolded plugs of polymers (e.g., thermoplastics, thermosetting plastics, elastomers, etc.) may be acceptable for covering recessed adjustment screws on regulators and carburetors only if the plug material has sufficient strength, hardness and adhesive properties. In other words, the plug must be of a very robust material that is not easily penetrated and/or pulled out of the recessed hole. Additionally, a plug may be of a material that "softens" after applying a solvent so that removing the plug is easier during authorized servicing. A plug should be installed flush with, or recessed below, the surrounding surface (See Figure F-3, Attachment A). Listings of examples of commercially available premolded parts that may be suitable for plugs are in Tables T-1 through T-5 of Attachment A.

- 4. <u>Screw-In Plug with Special Head</u> Adjustment screws with specially machined heads are acceptable. The various special-head designs of the fasteners shown in Figure F-10 of Attachment A may also be used for the special-head designs of screw-in adjustment plugs. Installing and removing these screw-in plugs should require using a special tool. Also, installing a screw-in plug should include specifying a torque value. See Figure F-4, Attachment A.
- 5. Locking-Steel Cap or Cover

Locking-steel caps consist of a collar held in place by a lock nut screwed onto the adjustable parameter. A cap having a minimum of four lugs covers the collar-lock nut assembly. The lugs are pressed into a circumferential groove on the collar (See Figure F-5, Attachment A). Steel is the preferred material.

6. <u>Alternate Steel Plug</u>

Alternate steel plugs can be used to cover recessed adjustment screws on regulators and carburetors. These plugs are steel caps with compressible prongs extending from the caphead (See Figure F-6, Attachment A). Also, these plugs could possibily be used in conjunction with plastic, elastomers, etc., materials to further enhance the tamper-resistance ability.

7 <u>Cover Plate</u>

Cover plates can be used to conceal an adjustable parameter. These plates may be attached to either the engine or a bracket. Specialheaded screws, such as the fasteners illustrated in Figure F-10 of Attachment A, should be used to fasten a cover plate (See Drawing D-1, Attachment A). Installing and removing the screw should require using a special tool. The screw installation should specify a torque value.

8. <u>Roll Pin</u>

A small-diameter steel pin mounted crosswise within a recessed hole will bar access to an adjustment screw (See Figure F-8, Attachment A) The pin should be installed with an interference fit. The exposed head of the adjusting screw should be a hex-head insert type. Otherwise, all other types of special-headed adjustment screws should be covered by a steel plug.

9 Special-Headed Locking Set-Screw

A special-headed screw (e.g., Torx <sup>™</sup> head, etc.) for locking the setting of adjustment is acceptable (See Figure F-9, Attachment A, and Acceptable Concept Method No. 4). The various special-head designs of the fasteners shown in Figure F-10 of Attachment A indicate acceptable special-head designs for a locking set-screw. Installing and removing the set-screw should require using a special tool. Installing a setscrew should include specifying a torque value.

- 10. <u>Limited Adjustment Range on A Regulator</u> Acceptable.
- 11. <u>Special Screw Adhesive and Solvent</u> Acceptable (Ref.: Acceptable Concept Method No. 3.).
- 12. <u>Pressed-In Orifice</u> Acceptable.

13. <u>Adjustment Using Internal Special-Headed Screw and Insert</u> Acceptable when used with a friction-inducing insert, or with Loctite<sup>™</sup> or similar compound. This method is similar to Acceptable Concept Method No. 9.

#### NOT ACCEPTABLE TAMPER-RESISTANCE CONCEPTUAL METHODS

- <u>Circular Ring -- Circlip</u> Not acceptable (See Figure F-11, Attachment A). Pliers used for removing and installing these clips are readily available at retail outlets.
- <u>Polyurethane Foam Application and Solvent Removal</u> Not Acceptable. Suggest using the method described in Acceptable Concept Method No. 3.
- <u>Other Screw or Screwhead Designs</u> Lefthand screw threads, and roundhead square-drive and clutch-head screw head designs are not acceptable for use in anti-tampering methods.
- 4 <u>Different-Colored Replacement Plug</u> The use of different colored plugs solely as an anti-tampering method is not acceptable. Plugs of different colors may be used; however, one of the acceptable concepts must be used to provide the antitampering method.

The EMA proposal also included suggestions about other possible areas or sources for additional anti-tampering method concepts. These other sources include:

- 1 Increased Usage of Plastic Materials The ARB recognizes that plastic materials may offer significant advantages over metallic materials in anti-tampering applications. Accordingly, a continued investigation of the availability of such suitable polymer materials is encouraged.
- <u>SAE J2317 -- Tamper Resistance For Diesel Fuel Injection Pumps</u> The Society of Automotive Engineers' (SAEs') Document J2317, "Tamper Resistance For Adjustable Parameters On Diesel Fuel Injection Pumps,' issued August 1996, provides information that may be applicable for anti-tampering methods used on gaseous-fueled ULGE engines.

Any requests for additonal information regarding this subject should be directed to Mr. Duc Nguyen, Manager, Certification Section, or Mr. Ronald Haste, Staff Engineer, at (818) 575-7067.

Sincerely, Chief Summerfield, R.

Mobile Source Operations Division

Attachment







## STEM BUMPERS



A Head Diameter	B Stem Diameter	C Head Height	Stem Length	E Overail Thickness	PART NO.	
174	3/16	3/16	3/16	3/8	1107	
5/16	3/16	1/8	3/16	5/16	713	
3/8	3/16	1/8	3/16	5/16	12	
7/15	1/4	1/8	1.4	3/8	709	
5/8 5/8	5/16 5/16	5/16 11/32	1/4 9/32	9/16 5/8	868 1114	
3/4	378	3/8	3 '8	3/4	1111	
5/8 7/8	7/16	5/16 3/8	5/16 15/32	5/8 27/32	1005	
15/16 1-3/16	19/32 5/8	19/32	15/32	1-1/16	1112	



A Head Diameter	Stem Diameter	C Head Height	Stem Langth	E Overail Thick-	F Chamfer Height	<b>G</b> Chamfer Diameter	PART NO.
1 2 1 2	3/16 3/16	.025 1 16	1/4	.275 \$~16		3.'32	4521 11 F
3.7	12	21 32	1 1 2	1-5/32	1 .	1	160
78 1-58	5 8 57 64	1 4 5 16	3/8 7'8	5/8 1-3/16	1 16	9/16	1647 1134

### BUSHINGS



A Inside Diameter	B Stem Diameter	C Flange Diameter	D Flange Height	E Stem Height	F Tatal Height	PART No.
1 '3 1 9	1 4 7 '15	3.'8 1.'2	7 '64 1 '4	17 '64	3/8 5/8	962 380
3.51	: 2	1 3.7	13	1 1	3.3	1015
11 64	32	12	3 32	1 7 64	1 :3 .61	795
1 16 1 16 3/16 3/16 3/16 3/16	7 16 7 16 7 16 1 2 1 2	3.4 3.'4 3.'4 11'16 3'4	1 16 1 16 1 15 1 4 1 3	5/16 7/16 11/16 3/16 1/1	3/8 1/2 3/4 7 15 3 8	723 724 722 378 1761
7 '32 7 '32 7 '32 7 '32 7 '32	13 '32 7 '16 1 '2 1 '2	1/2 1 3/4 3/4	1 '16 3/16 1 '8 3 '16	3/16 1.'8 1'4 27 '32	1.4 5/16 ,3/8 1-1/32	557 232 767 1222
*1/4 1/4 1/4 1/4 *1/4	3/8 13/32 7/16 1/2 19/32 5/8	3/4 5/8 5/8 1 3/4 1-1./2	1/8 3/32 3/64 1/8 1/8 1/15	3/8 5/16 13/64 3/8 3/8 5/8	1.7 13/32 1.4 1/2 1/2 11/16	174 1681 748 643 579 718-1
5/16 •5/16 5/16 5/16	15/32 1/2 1/2 5/8	1-1/4 3/4 1-1/4 1	3/16 1/8 3/16 1/4	3/16 9/32 13/32 3/8	3/8 13/32 19/32 5/8	1544 646 1185 29
3/8	5/8	1-1/2	1/16	5/8	11/16	7182
4-3/4	5-3/4	6-5/8	3-3/16	7.'8	5-5/8	1606

ALL STATES RUBBER & TOOL CORP.

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TABLE T-2: PLASTIC PLUGS

(312) 479-4000 TELEX 265661 FAX 479-4003

















