



Sensible Products For A Better Outdoors

March 8, 2000

RECEIVED

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Mr. Allen Lyons  
California Environmental Protection Agency  
Air Resources Board  
Mobile Source Operations Division  
9528 Telstar Avenue  
El Monte, CA 91731

CERTIFICATION BRANCH

Dear Mr. Lyons:

This letter is sent pursuant to the meeting between PPEMA representatives Mssrs. Will, Cigler and Hall (via speakerphone), yourself, and some of your staff on February 1, 2000. As you will recall, PPEMA indicated that it would refer the points raised during the discussion to its General Engineering Committee and provide you with a letter clarifying PPEMA's understanding of the three main topics of discussion, Alternative Duty Cycles for deterioration testing, use of the 15% Compliance Margin, and establishment of common deterioration factors for engine families of the same technology.

### Alternative Duty Cycles

Due to ARB's concern that engine manufacturers would always use a 3-minute duty cycle if given the opportunity, PPEMA suggests that products be categorized according to the duty cycles listed below for the purpose of deterioration factor testing:

Chain Saws	3 Minutes
Hedge Clippers	3 Minutes
Pole Pruners	3 Minutes
String Trimmers	6 Minutes
Stick Edgers	6 Minutes
Brushcutters	6 Minutes
Hand-held Leaf Blowers	6 Minutes
Back Pack Leaf Blowers	20 Minutes

These duty cycles would be used unless there are compelling reasons why they do not apply in individual cases. These cases would be presented to ARB with reasons for requesting a waiver. PPEMA's approach adds hedge clippers and pole pruners to the already established 3 minute cycle for chain saws, adds a 6 minute duty cycle for products such as string trimmers, stick edgers, brushcutters and hand-held leaf blowers, and places back pack blowers in the 20 minute



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duty cycle currently allowed by ARB. It is felt that these duty cycles are representative of the actual usage of the products listed. Due to the urgent nature of this matter as it pertains to the model year 2000 certifications anticipated, ARB's prompt consideration and response is requested.

### **Application of 15% Compliance Margin**

PPEMA understands that ARB's criteria for re-testing will be applied as follows:

Confirmation testing will not be required if a test engine's measured emissions are at least 15% lower than the manufacturer's established FEL. If the emissions are within 15% of the manufacturer's established FEL, the manufacturer has the option either to perform additional confirmation testing or to show that the measured emissions value plus the production line variability in grams/hp-h does not exceed the manufacturer's established FEL. If this condition is shown to be true, ARB will not require confirmation testing

PPEMA accepts this approach.

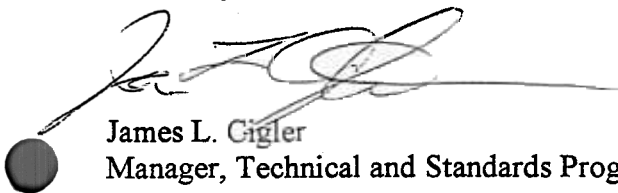
### **Common Deterioration Factors**

New engine technologies will be certified under the ARB Tier II procedures specified for the Model 2000 products. PPEMA understands that ARB will evaluate data at the end of that period and consider allowing the assignment of a common deterioration factor for a family of engines employing the same technology if the result of the data analysis supports that finding.

PPEMA would like to submit, under separate cover, its rationale supporting its contention that deterioration factors for traditional two-stroke engine technology with no after engine treatment should be assigned a value of 1.0. It is requested that ARB then consider and respond to the PPEMA position as it relates to the Tier II certification process.

PPEMA requests that ARB acknowledge its agreement or disagreement with PPEMA's suggestions related to alternative duty cycles and its interpretation of the ARB's application of the 15% compliance margin at your earliest possible convenience. I will be contacting Mr. Duc Nguyen of your staff within the next week for further discussion of these matters.

Sincerely,



James L. Gigler  
Manager, Technical and Standards Programs

cc: Duc Nguyen