California Environmental Protection Agency
Air Resources Board



Advisory

TO: HEAVY DUTY DIESEL ENGINE, TRUCK AND APS MANUFACTURERS, FLEET MANAGERS, AND OTHER INTERESTED PARTIES

Number 376 June 2008

ALTERNATE LOCATION PLACEMENT FOR "CERTIFIED CLEAN IDLE" OR "VERIFIED CLEAN APS" LABELS

This advisory addresses requests to affix the "Certified Clean Idle" and "Verified Clean APS" labels required by Title 13, California Code of Regulations (CCR) Sections 1956.8(a)(6)(C), 2404, 2424, 2485(c)(2)(A)2., 2485(c)(3)(D), and 2485(d)(1)(B) in alternate locations. "Certified Clean Idle" labels are required for vehicles that use an engine that has been certified to an optional NOx idling emission standard of 30 grams per hour. "Verified Clean APS" labels are required on vehicles equipped with 2007 and subsequent primary drive engines and using:

- a diesel-fueled auxiliary power system (APS) equipped with a verified Level 3 in-use control strategy for particulate matter,
- a diesel-fueled APS that has its exhaust routed through the vehicle's particulate matter after-treatment device, or
- an internal combustion APS operated on a fuel other than diesel.

Section 35.B.4 of the "California Exhaust Emission Standards and Test Procedures for 2004 and Subsequent Model Heavy-Duty Diesel Engines and Vehicles" specifies the content and label location requirements for these labels.

The Air Resources Board (ARB) has received several requests to place "Certified Clean Idle" and "Verified Clean APS" labels in alternate locations. ARB understands that placing the label on a vehicle's hood may present problems, since truck hoods are commonly replaced due to accidents. This will result in more frequent label replacements, as well.

Section 35.B.4.3.1 provides:

"The appropriate label shall be permanently affixed to the exterior on the driver's side of the hood, in an area within one foot by one foot from the top and front edges of the hood. If such an attachment is not feasible, the label may be attached at a different location subject to advance approval by the Executive Officer."

Although an engine or APS manufacturer may request an alternate label location, ARB will only consider approving locations that are on the driver's side of the cab where a label would be plainly visible to an inspector. For example, an engine or APS manufacturer may request to place labels directly on the driver's side of a sleeper berth cab (see photo below).

Each engine and APS manufacturer must request Executive Officer approval of an alternate location for a "Certified Clean Idle" label through the normal certification process. Engine manufacturers shall submit a request to ARB electronically through the Document Management System which can be accessed at (https://secure.arb.ca.gov/edms/servlet/edms.do). For alternate placement of "Verified Clean APS" labels, manufacturers may contact David Chen of the Mobile Source Control Division at (626) 575-6673 or dchen@arb.ca.gov.

For more information regarding this advisory, please contact David Chen or Nancy O'Connor of the Enforcement Division at (916) 322-8325 or noconnor@arb.ca.gov.



Example of an Alternate Location (Requires Executive Officer Approval)