Heavy-Duty and Nonroad Engine Group

EMA Certification Workshop
May 5, 2010
Topics

- Certification Team and Statistics
- Nonroad SCR Certification
- Confirmatory Testing
- Defect Reports
- Verify
- In Use Testing and Reporting
- Compliance Reports
Certification

- Certification Team
  - New staff joining the cert team
  - Manufacturer representatives will be reassigned

- Average processing time for Large CI
  - 2009MY - 41.14 days
  - 2008MY - 48.2 days
  - 2007MY - 53.0 days
Heavy-Duty and Nonroad Engine Group

Khesha Reed – Group Manager

CI Team (DC)
Gregory Orehowsky – Team Leader
  Jason Gumbs
  Justin Greuel
  Melvis Strickland
  Larry Oeler
  Joe Hresko
  *Richard Deadwyler
  New Student
  New Hire

Attorney
David Dickinson
  Robert Doyle
  Kristien Knapp

Compliance Support
Clifford Dean
  Carl Wick
  Nydia Reyes-Morales

SI Team (AA)
Holly Pugliese – Team Leader
  Julia Giuliano
  Sara Zaremski
  Dan Cullen
  Jay Smith
  *Mike Marko
  *Nick Flores

*Senior Support
# Certification Summary

**Date of Report:** 4/28/10  
**Parameters of Report:** 2009 Model Year

## On-Hwy
- Diesel Certificates: 88
- Gas Certificates: 23
- Diesel FEL Changes: 10
- Gas FEL Changes: 5
- On-hwy Running Ch.: 8
- On-hwy Corrections: 10

## Non-Road CI
- Diesel Certificates (all): 616
- Stationary-nonroad: 128
- Stationary only: 5
- FEL Changes (all): 6
- Running Changes (all): 87
- Corrections (all): 87

## Marine CI/IMO
- Certificates (all): 193
- Marine CI Certificates: 150
- IMO Certificates: 43
- FEL Changes (all): 2
- Running Changes (all): 12
- Corrections (all): 27
<table>
<thead>
<tr>
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<th>NRSI &lt;25hp</th>
<th>Marine SI</th>
<th>Snow/Evap</th>
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<td>Certificates (all):</td>
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<td>37</td>
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<td>IA:</td>
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<td>IB:</td>
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<tr>
<td>I:</td>
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<td>17</td>
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<td>II:</td>
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<td>III:</td>
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<td>IV:</td>
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<td>V:</td>
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<tr>
<td>FEL Changes (all):</td>
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<td>Running Changes (all):</td>
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<td>Corrections (all):</td>
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<table>
<thead>
<tr>
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<th>Large SI</th>
<th>Snow</th>
<th>Evap On-hwy</th>
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<tr>
<td>Certificates:</td>
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<td>Corrections:</td>
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</table>

Certificates total 2,510  Fel changes total 95  Running changes total 545  Corrections total 176

Total Submissions 3,487
Certification

- 2010 Lessons Learned
  - Late cert season
  - Still reviewing 2010 applications
  - Early communication with cert staff extremely beneficial
  - Automatic approval – only when specified in regulations
Nonroad SCR Certification

- Short guidance outlining applicable regulations planned
- Scheduled Maintenance (1039.125)
  - Need petition if DEF refill less than every 4,500 hours
  - Maintenance must be reasonably likely to occur in use
  - Driver warning/inducement strategies
- Adjustable Parameters (1039.115(e) and 1039.801)
  - Identification of incorrect reducing agent
  - Tamper resistant design
  - DEF availability (infrastructure development)
Nonroad SCR Certification

- AECUs (1039.115(g) and 1039.801)
  - Freeze Protection
- Unregulated Pollutants (Section 202(a)(4) of CAA)
  - Ammonia – need to show durability over entire useful life
  - Vanadium – sublimation and particulate emissions
  - Dioxins – ongoing EPA test program
- Talk to your certification representative
Confirmatory Testing (2009 and 2010)

- Nonroad CI - at NVFEL and contract labs
- Small SI – at NVFEL
- HD Diesel – at manufacturer lab
- Testing at contract labs to be expanded in 2010
- Insert CI and SI tables
New DR/VERR System Development

- PDF form based system being developed in house for defect and voluntary emissions recall reports
- Templates to be submitted via CDX

Current Status
- Completed EPA internal system testing
- Minor revisions based on feedback and review of revised forms
  - Example: removed question regarding submittal of report within regulatory required 15 day period
- Beginning EPA internal acceptance testing
Next Steps

- Set up manufacturer user accounts for testing
- Manufacturer System Testing Phase
  - Enter data into forms
  - Submit data to test environment via the Verify Document Module
Timing/Schedule Targets

- Manufacturer Testing Phase: May 10-21, 2010
- Review issues from manufacturer testing phase and revise, as necessary: May 24-28, 2010
- System Deployment: May 28 - June 4, 2010
  - DR/VERR software components installed in Verify production environment
- Issue a manufacturer guidance letter: June 4, 2010
  - Discuss system details and announce official use of new DR/VERR system in 15 working days
- System Implementation: June 28, 2010
Questions regarding the DR/VERR System should be directed to:

Arvon L. Mitcham
734.214.4522
Mitcham.arvon@epa.gov
Verify

- Development of Nonroad CI and Nonroad SI certification modules on schedule
- Next meeting – Web Conference on 5/19/10
- For more information - http://www.epa.gov/otaq/verify/index.htm
  - Schedule
  - Documents and presentations
- IMS cut off date – 7/16/10
- Verify start date – 8/16/10
In Use Testing and Reporting

- Heavy-Duty In Use
  - Reports from 2\textsuperscript{nd} year of enforceable gaseous program (selected in 2008) were due 3/2010
  - Reports from 1\textsuperscript{st} year of PM pilot (selected in 2007) due 5/2010
  - Selections for 2010 will be issued in June

- Nonroad In Use
  - Proposed rule in draft stage
Compliance Reports

- Renewed focus on compliance reports (ABT, PLT, Production, In Use)
- Most templates complete
- Templates to be loaded into a compliance database for EPA auditing and review
- Guidance document to be issued
  - Templates posted
  - Requesting missing reports
  - Outlining consequences for non compliance