Questions and Answers

Heavy-Duty Engine Manufacturer Feedback to October 2014 Verify Requirements Package

These are the responses to the comments we have received thus far from manufacturers. We will periodically update this document as we receive any additional comments.

What is the purpose of data element 7 "Branding Arrangement"?

The purpose of this data element is to identify the manufacturers that will be listed on the engine label. See 86.095-35(a)(3)(iii).

Regarding data element 15 "Intended Service Class" how would a manufacturer enter an otto-cycle engine family that is intended for vehicles in the less than or equal to 14,000 lbs GVWR?

You would use option "HDO1 - Heavy-Duty Otto Cycle engines for use in all vehicles regardless of Gross Vehicle Weight Rating (GVWR)" for Intended Service Class.

Regarding data element 16 "Intended Engine Application" the regulations treat vocational tractors as vocational vehicles. It is not clear from the designation whether the user should select 'V' or 'B' for an engine family that covers both vocational non-tractors and vocational vehicle tractors.

In this example the user would select 'V' for vocational. A vocational tractor is always a vocational vehicle.

Regarding data element 24 "Ambient Operating Region" by definition in the regulations, the application of NTE has both temperature and altitude limits.

You cannot choose altitude limits, only temperature. See 86.007-11(a)(4)(ii)(B)(1).

EPA United States Environmental Protection Agency

Office of Transportation and Air Quality
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Regarding data element 29 "Time-Weighted Carve-Out LTR - X Point" and data element "Time-Weighted Carve-Out LTR - Y Point" will the system allow manufacturers to specify multiple points to define the carve-out, or just one point?

The system will allow manufacturers to specify multiple points.

Regarding data element 56 "Agent for Service Identifier", could you provide a definition of this data element?

Agents for Service are identified in your Manufacturer Information and selected in the application. The Agent for Service Identifier is a pointer to an Agent for Service you entered in your Manufacturers Information.

What is the intent of data elements 86 to 91 relating to Auxiliary Emission Control Devices (AECD)?

In the application you will be required to identify each AECD (data elements 86 to 91). You will also submit a document containing a detailed description of the AECDs. This is the same process you should be following now in Filemaker Pro.

What is the intent of data elements 92 to 94 relating to Adjustable Parameters?

In the application you will be required to identify each Adjustable Parameter (data elements 92 to 94). You will also submit a document containing a detailed description of the adjustable parameters. This is the same process you should be following now in Filemaker Pro.

Regarding data elements 131 "Part Using Start Date" and 132 "Part Using End Date", the exact start and end dates for parts are not generally known.

The purpose of these dates is to determine when a part is introduced to production and when a part is no longer in production.

Regarding data elements 134 through 144 relating to Infrequent Regeneration Adjustment Factors (IRAFs), would these not be covered in the additional IRAF Determination Document? Or is that standalone document simply the calculation methods, with the values residing in the application itself?

Yes, the actual values need to be specified in the application so the system can calculate and use the adjustment factors in certified emission result calculation. The document contains a detailed description of the method used to determine the IRAFs.

Regarding data element 149 "Durability Engine Service Accumulation", what value does this add to the bench aging process?

The data elements and business rules will be adjusted as follows to accommodate the bench aging process for deterioration factors.

a. Data element 145 "DF Determination Method"

i. The description will be changed to "An indication of how the Deterioration Factor (DF) was determined".

ii. Change the enumeration to (business rules may need to be adjusted):

A = Assigned by EPA

B = Manufacturer bench aged

S = Manufacturer service accumulation

Data element 159 "Test Laboratory Code" seems to imply that a code is required for each Test Laboratory. What is this?

Test Laboratories are entered in your Manufacturer Information and then selected in the application. You will not need to do anything special for Test Laboratories other than enter them once in your Manufacturer Information.

Data element 169 "Idle CO Waiver Indicator" only pertains to non-OBD-equipped, gasoline-fueled engines (see 40 CFR 86.008-10(a)(iii)(B). Therefore, this data element should not be a required field.

If this does not apply to your engine then select "No".

Data elements 182 to 188 relating to steady-state test results are marked as required even though these do not apply to gasoline-powered engines.

The following business rule will be added to address this:
If Engine Combustion Cycle (31) is equal to "T = Otto" then Steady-State Test Results (HDH-GRP-44) is not allowed.

The "Originator" (Column Y) is listed as "Verify" for data elements 188 "Steady-State Fuel Consumption" and 189 "Transient Test Fuel Consumption". Does this mean these values will be calculated based on the CO2 results?

The Originator Column is incorrect. These values are to be entered by the manufacturer.

In data element 221 "Fuel" does ethanol mean 100% ethanol? Or does it mean something like E85 or E10?

This means a fuel with a nominal alcohol content greater than 25% by volume (see 1036.801).

Item "Scheduled Maintenance Description has a mis-cited regulation reference(column C); it should read "86.094-21(b)(5)(iii)(A)," not "86.0094-21(b)(5)(iii)(A)".

This will be fixed in the next version of the data requirements document.

Has there been any effort to harmonize this Verify Module with CARB?

The data requirements are based on the EPA regulations. We are happy to share any materials and answer any questions CARB may have on this system.

Will there be the capability of doing a "batch" upload of the application information into the module?

Yes. You will be able to batch upload an entire application via XML. You will also be able to upload specific data into your application via a CSV file similar to what was done for Nonroad SI, Nonroad CI, and Marine CI.

Will the new module be replacing the Model Summary Form with individualized model entry for each engine family? This will increase the work required to submit an application.

In the new module you will be required to enter model related data for each model covered by the engine family similar to what you do in FileMaker now.

Will the new module be replacing the Part Number Summary Form with individualized part number entry for each engine model within a family? This will increase the workload to submit an initial application, a carryover application and a running change.

In the new module you will be required to enter each part number for emissions related components for each model similar to what you do in FileMaker now. For Running Changes and Carryover you can re-use a previous submission so you don't have to enter everything again.

There were several comments indicating that certain fields should be considered CBI. Whether a specific field is considered CBI will be based upon the official class determination titled "Class Determination 1-13, Confidentiality of Business Information Submitted in Certification Applications for 2013 and Subsequent Model Year Vehicles, Engines and Equipment". A guidance letter announcing the determination can be found at:

http://iaspub.epa.gov/otaqpub/display_file.jsp?docid=30041&flag=1

the actual determination is located at:

http://www.epa.gov/ogc/documents/1-13.pdf