Proposed Exemption Regulation for Motorcycle Aftermarket Emission Critical Parts

WORKSHOP

April 9, 2008
Overview

• Background
• Staff proposal
  – Exemption process
• Information needs
• Conclusion
• Contacts
Background

Aftermarket Parts Section:

• Exemption process for non-critical emission components
  – Testing to show no emission increase

• Exemption process for critical emission components
  – Testing to show no emissions increase
  – Not allowed until emission warranty expires
  – Requires durability demonstration
Background (cont.)

- **Examples of aftermarket critical emission control components**
  - Catalysts (in exhaust system), oxygen sensors, hydrocarbon adsorbers

- **Examples of aftermarket non-critical emission control components**
  - Air intakes, exhaust manifolds, camshafts, ECU controllers, superchargers
More stringent motorcycle emission standards

Increased use of catalysts by OEMs

High rate of modification in motorcycles

No existing aftermarket evaluation procedures for motorcycle critical emission control components (CECC)
Proposed Regulation

- Applicable to all aftermarket CECC for use on highway motorcycles still under warranty
- Very similar to new motorcycle certification requirements
  - Emissions testing
  - Warranty and labeling
  - Quality audit
  - In-use testing/recall
Emissions Testing

Test Vehicle Selection

- LVW
- N/V ratio
- Projected sales

Durability Accumulation

Total Test Distance (km)
Class I: 6,000
Class II: 9,000
Class III: 15,000

- May waive evaporative testing
- Testing must be done at an ARB recognized laboratory.

Emission Testing

DF Calculation

Emission Compliance

Confirmatory Test

Linear regression (4 test points min.)

Same standards used by OEM

Done within 30 days of emission data submittal
Warranty and Labeling

• Component emission warranty
  – Five years/applicable useful life mileages
  – Assures reliability of emission critical AM parts

• Installation warranty
  – Same coverage as emission warranty
  – Liability to part manufacturer or installer
  – Similar concept to diesel retrofits

• Labeling similar to current exemption requirements
Quality Audit

• Used to ensure uniform part production
• Quarterly reports must be submitted 30 days after each quarter
  – Part numbers
  – VINs
• ARB can ask for testing of one part for every 500 sold
In-Use Reporting/Recall

- Defects reporting would be similar to what is done for OEMs (13 CCR 2166-2174)
- In-use testing of up to 20% of exempted engine family applications
- Failure of 4% or 25 parts would require corrective action
Penalties

• Noncompliance with any regulatory provision could result in:
  
  − EO revocation

  − Other possible civil penalties
Exemption Process Summary

Letter of Intent
(List parts and engine families)

Application Submittal
(Complete info?)

YES

ARB Reviews Test Data

EXCEPTION EO Issued
(Up to 90 days review upon receipt of complete application)

NO

Obtain add’l info

Confirmatory Testing (if needed)

QA/In-Use Reporting/Recall

California Environmental Protection Agency
Air Resources Board
Application Submittal

• Follow guidelines in paragraph (c)(4) of the proposal

• Must contain the following:
  – Applicable engine family
  – Part/kit description
  – Emissions/durability data
  – Warranties
  – Labeling
  – Installation instructions and locations
  – Safety statement
Information Needs

- Staff needs assistance to generate economic and market information for Board package

- Responses are needed to handout questions
Conclusion

• Proposal is for aftermarket critical emission parts for highway motorcycles still under warranty only

• Requirements are similar to new motorcycle certification

• Next steps:
  – Submit workshop comments by April 30, 2008
  – Industry economic data needed by May 15, 2008
Contact Information

• ARB Website:
  www.arb.ca.gov/msprog/aftermkt/motorcycle1/motorcycle1.htm
  www.arb.ca.gov/msprog/onroad/cert/hmcctp/hmcctp.htm

Mailing Lists:
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• Questions?