California’s Anti Tampering Exemption Evaluation Procedures

Aftermarket Parts Procedures
Modification Workshop

May 8, 2018
AGENDA

• Introductions
• Why Are We Here?
• Understanding the Application Process
• Solicitation of Ideas to Improve the Process
• Goals for Modifications
• Next Steps
• Questions
Introductions

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Why Are We Here?

- Vehicle code (VC) 27156 and VC 38391 prohibit the sale and use of parts that modify engines or vehicles from their originally certified configuration.

- The Aftermarket Parts “Procedures for Exemption of Add-on and Modified Parts” (Procedures) provides the process and criteria for add-on and modified parts\(^1\) to obtain an approval from this Law.

- The Procedures must be robust enough to ensure aftermarket parts have no adverse impact on emission control systems of the certified engine or vehicle and no adverse impacts on any emission testing standards.

- The purpose of this workshop is to solicit ideas to update the current Procedures to address current technology, standards, and test cycles.

\(^1\)Defined in 13 CCR 1900(b)(1 and 10) and 2222
Aftermarket Parts Exemption Process Summary

Is application complete? YES → Manufacturer submits test memo → Manufacturer conducts testing through an independent laboratory → Lab submits test report to CARB for review → CARB reviews test results and issues Executive Order

Is application complete? NO → Manufacturer submits additional information → Confirmatory testing? → CARB performs confirmatory testing
Areas for Discussion

• Application Content
• Scope of Application
  – Specific component issues
  – Vehicle coverage
• Test Plans
• Goals
Application Content

• A complete application includes:
  • vehicle/engine list by test groups/engine families
  • complete device descriptions
  • installation instructions
  • samples of the EO label
  • marketing/advertising documents (optional)
  • parts material specifications

• Improved tools help a manufacturer to provide a complete application?
  • Website
  • Electronic Submission/Application form
  • More clarity in the Procedures on how to submit
Scope of Application

- Device type may affect emission control systems differently. What are the issues?
  - Forced Induction System (supercharger, turbocharger)
  - Air Induction (air intake kit, intercooler, throttle body)
  - ECU (tuner, re-flash, piggy-back tuner)
  - Fuel tanks (mobility modifications)
  - Innovative technology
  - Others
Scope of Application

• Vehicle coverage
  – Simple versus complex: affects processing times
  – Emission design types/strategies are different for each original equipment manufacturer
  – Emission standards categories changing each model year for light-duty vehicles
  – Engine designs
    • Various testing requirements and control strategies
    • Different effects from type of modification
Test Plans

- Emissions testing based on scope of application
  - Scope of vehicle coverage
    - Number of test vehicles
  - Device type or extent of modification
    - Number of test vehicles
    - Test cycles per vehicle
    - Fuel type requirements
Goals

• Appropriate modifications to streamline process
  – Better definitions for application
    • Manageable and representative application scope to ensure no adverse impacts on emissions and emission control systems
    • Reduce testing requirements per application
    • Improve quality of application contents to issue EO faster
  – Discuss OBD interaction
  – Real world in-field emissions testing
  – Test Laboratory requirements
  – Others?
Next Steps

• Technical Workgroups – mid 2018
• Next Workshop mid to late 2018
• Board Hearing in 2019
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Questions