

EPA Chassis Certification Issues

EMA Certification Workshop

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EPA Chassis Certification Issues

- Proposal for Optional Medium-Duty Vehicle Chassis Certification for Gasoline and Diesel Vehicles Over 14,000 LBS. GVWR
- Optional Chassis Certification (Model Year 05/06)
- Phase-In/Intermediate Standards for Diesel Complete Vehicles

Proposal for Optional Medium-Duty Chassis Certification for Gasoline and Diesel Vehicles Over 14,000 LBS. GVWR

- Proposal:
 - Allow gasoline and diesel engines over 14,000 lbs., whether certified as complete or incomplete vehicles, the option to certify to the medium-duty (between 10,000 and 14,000 lbs.) chassis dynamometer certification standards. No more than 5 % of an engine family certified to the MDV standards could be over the 14,000 lbs. limit (the remainder of the engine family must be under 14,000 lbs.).

Proposal for Optional Medium-Duty Chassis Certification for Gasoline and Diesel Vehicles Over 14,000 LBS. GVWR

- Rationale:
 - Allows additional flexibility for grouping engine families together, thereby reducing certification workload
 - Self-limiting provision as physics of the engine limit the practical workability of using such an option for heavier engines.
 - Consistent with EPA's expansion of light-duty Tier II requirements to include engines/vehicles up to 14,000 lbs.

Optional Chassis Certification (Model Year 05/06)

- EMA has requested that EPA make optional chassis dyno certification for complete Heavy-Duty vehicles available for 2005-2006. EPA has no objection with respect to <14,000 lbs. GVWR, but has not yet published the clarification in a direct final rule.

Phase-In/Intermediate Standard for Diesel Complete Vehicles

- In the 2008 MY, at least 50% of heavy-duty gas complete vehicles (8,500 to 14,000 lbs. GVWR) must meet the new 2008 MY chassis dyno emission standards, with 100% compliant in 2009. And just like heavy-duty gas manufacturers can “split” an engine family and meet an “intermediate” standard using the ABT provisions rather than doing a 50/50 phase-in. So for 2008, we can certify all HD gas complete vehicles (8.5-10K GVWR) to 0.2/0.47 g/mi NMHC/NOx rather than certify 50% of the vehicles to 0.195/0.2 g/mi NMHC/NOx and other 50% to 0.28/0.9 g/mi NMHC/NOx.

Phase-In/Intermediate Standard for Diesel Complete Vehicles

- The EPA regulations also allow 2007 and later model year heavy-duty diesel vehicles to optionally be certified to the heavy-duty complete vehicle chassis dyno standards and requirements. HOWEVER, the regulation requires that all heavy-duty diesel vehicles using this option must comply with the final 2008 model year standards (i.e. 0.195/0.2 g/mi NO_x) in 2007. Diesels cannot use phase-in provisions or certify to an intermediate standard like heavy-duty gas can if they optionally certify on the chassis dyno.

Phase-In/Intermediate Standard for Diesel Complete Vehicles

- In 2008, a heavy-duty diesel vehicle must meet a more stringent standard (0.195/0.2 g/mi NO_x) than a HD gas vehicle (0.23/0.47 g/mi NMHC/NO_x) if the diesel is optionally certified on the chassis dynamometer. This seems to punish the heavy-duty diesel manufacturer who wants to chassis certify his product.

Status/Recommendation

- On July 25, 2003, EMA submitted to EPA an outline clarifying these issues
- Periodic follow up with EPA – ASD has not resulted in resolution
- Take appropriate steps to establish issues as priority with EPA - ASD