

ATTACHMENT

DRAFT ARB STREAMLINED CERTIFICATION PROCESS FOR CARRYOVER AND PARTIAL CARRYOVER CERTIFICATION APPLICATIONS

INTRODUCTION

Manufacturers of mobile source engines, equipment, and vehicles (manufacturers) have requested Air Resources Board (ARB) certification staff develop an expedited process for those certification applications where there are limited changes made to their product from the previous model year application. In response, ARB certification staff has developed a streamlined review process for “carryover” applications, with some limitations. This mail-out describes the ARB procedures for certifying mobile source vehicles, equipment, and engines using this newly developed certification process.

The streamlined certification process will be applicable to “carryover” and “partial carryover” certification applications as defined below. This process is an optional certification pathway available to manufacturers for speedy certification. Manufacturers may request ARB Executive Orders (EOs) in an expedited manner as long as the carryover or partial carryover certification application meets the prescribed qualification criteria and is submitted using the appropriate certification procedures. The traditional certification process will remain available to all manufacturers who cannot or opt not to use this new optional streamlined certification pathway.

The streamlined certification process for carryover and partial carryover certification applications will become effective and available to manufacturers starting **MM/DD/YYYY.**

BACKGROUND

The numbers of mobile source categories that must go through certification have increased over the past 20 years. The categories have expanded from passenger cars, heavy-duty trucks, and motorcycles, to include small spark-ignition engines and equipment, off-road recreational vehicles, and off-road compression-ignition engines. In 2002, ARB issued about 2,100 EOs to off-road and on-road mobile source

manufacturers. In 2012, that number had grown to about 3,000 EOs issued. The mobile source EOs cover a wide variety of engines and equipment types ranging from single-cylinder, 20 cc handheld leaf blowers to 16-cylinder, 78 liter generators, both exhaust and evaporative emissions requirements, and engines fueled from gasoline and diesel to alternative fuels, hybrids, and battery electric.

In order to obtain an EO through the traditional certification process, a manufacturer submits a certification application to ARB for review. The process must be repeated each year the manufacturer plans to produce and sell products into California. This process is initiated when the manufacturer creates an application workflow in ARB's electronic Document Management System (DMS). The manufacturer has the option of adding documents to the workflow in a piecemeal fashion (over a period of time), or submitting a complete application package to the workflow in one step (the preferred option). ARB staff monitors the status of the documents in DMS and notifies the manufacturer (in writing) within thirty days of the initial application workflow submittal. The notification informs the manufacturer whether the application package is "Accepted for Filing" or "Not Accepted for Filing." An application package is "Accepted for Filing" if it contains all of the elements needed to complete an application. This notification does not constitute issuance of an EO by ARB. Once all the necessary documents in the ARB certification application package checklist (Appendix A) have been submitted by the manufacturer, ARB staff reviews the submitted package to check whether that application complies with all applicable California emissions control regulations and requirements and if so, an EO will be issued. Please note that manufacturers will be issued an EO within ninety calendar days from the time that a complete application package was "Accepted for Filing" if the complete application contains all the information needed to demonstrate compliance with applicable requirements.

ARB staff solicited and received input from a number of manufacturers and industry trade groups during the course of certification-related meetings regarding how certification applications change from year to year. ARB staff identified a number of mobile source on-road and off-road certification categories, where there are limited changes to the certification application from one model year to the next. This is due to a number of factors, including emission regulations remaining the same for a number of model years and manufacturers' product design changeover.

Recognizing that in such situations the level of review by certification staff may be reduced and the issuance of EOs may be expedited, ARB staff has developed this new optional streamlined certification process. This process is only applicable to two narrow subsets of certification applications:

- Carryover applications, and
- Partial carryover applications.

These two categories of applications are defined in the following sections. The applications must adhere to the specific guidelines for carryover and partial carryover definition before the application may be identified using the DMS workflow name as such. In addition to submitting a complete application package (which includes all checklist documents), manufacturers must also submit a signed letter by the manufacturer's representative (for this purpose, third party consultants are not considered manufacturer's representatives) identifying the application as a carryover or partial carryover application. A separate signed letter is required for the carryover or partial carryover application of each engine family/test group/evaporative family. This letter may be combined with the statement of compliance letter.

In order to file a carryover or partial carryover certification application using the streamlined process, manufacturers must have all the elements required in the certification checklists (Appendix A) ready before submitting a workflow to the DMS including a signed carryover or partial carryover application request letter. For some applications, this will include the proper approval for an on-board diagnostic (OBD) system, or submission into the E-Cert database. If a manufacturer fails to provide a complete application package (containing all of the elements in the corresponding checklist), or submits documents in a piecemeal manner to the DMS workflow (over a period of days or weeks), the application will not be considered a carryover or partial carryover application. Under this scenario, the manufacturer will then be required to rename the workflow and follow the traditional certification process, but the application will not need to be resubmitted.

The following sections describe the applicability and the specific requirements of the streamlined certification process in detail.

CARRYOVER APPLICATION

A carryover application is identical to the previous model year's application except for the:

- Model year,
- Test Group/Engine/Evaporative family name (typically the first character),
- Manufacturer contact information, and
- Projected sales data.

The carryover application must also incorporate all running changes that were submitted during the previous model year and that remain applicable for the new model year certification. The manufacturer will attach a carryover cover letter (Appendix B) to the application that attests no changes were made to the application from the previous model year (except for the above specified bullet items). The cover letter may be combined with the statement of compliance letter for the referenced test group/engine/evaporative family.

Manufacturers are responsible for submitting a complete and accurate application package, and the authorized manufacturer's representative would sign that the application package is correct and meets the carryover criteria. For carryover applications that are submitted correctly, ARB will strive to issue the EOs within 30 calendar days of the DMS workflow submission.

PARTIAL CARRYOVER APPLICATION

Partial carryover applications are similar to carryover applications, except that there are additional categories of information that may change from the previous model year's application. A partial carryover application is identical to the previous model year's application except for (the additional criteria for a partial carryover over a carryover application are in *italics*):

- Model year,
- Test Group/Engine/Evaporative family name (typically the first character),
- Manufacturer contact information,

- Projected sales data,
- *Model names (may add models if the certification emission levels are not changed),*
- *Part numbers (new parts are durable to full useful life and do not impact the certification emission levels), and*
- *Equipment types.*

The partial carryover application must also incorporate all running changes that were submitted during the previous model year. The manufacturer will attach a partial carryover cover letter (Appendix C) to the application that attests no changes to the application from the previous model year (except for the above specified bullet items). The cover letter may be combined with the statement of compliance letter for the referenced test group/engine/evaporative family.

Manufacturers are responsible for submitting a complete and accurate application package, and the authorized manufacturer's representative would sign that the application package is correct and meets the carryover criteria. For partial carryover applications that are submitted correctly from February through October time-period (not during ARB's peak certification season), ARB will strive to issue the EOs within 45 calendar days of the DMS workflow submission. Partial carryover applications that are submitted during ARB's peak certification season (November through January) will be processed within the traditional certification timeline (90 calendar days from the date that the application was "Accepted for Filing").

DMS SUBMISSION GUIDELINES

Manufacturers who are planning to utilize the new carryover or partial carryover application process must submit a complete application package to DMS using the proper workflow naming convention. The workflows must be identified by adding the following keywords to the beginning of the workflow process name:

- "CARRYOVER_" (for carryover applications), and
- "PCARRYOVER_" (for partial carryover applications).

Use of the proper naming convention is critical because the DMS system uses this information to notify the certification staff that the application package should be processed under the new streamlined application guidelines and timeframe.

Upon review of the application package, if the certification staff determines that the application is not named properly and/or does not meet the criteria for carryover or partial carryover definition, ARB staff will inform the manufacturer of the reasons why the application does not qualify for the streamlined certification process. The manufacturer will then have to rename the workflow process using the traditional certification naming convention and add/modify the documents in the workflow. The application will not need to be resubmitted, but the 30 or 45 day review time will no longer apply. Please note that each carryover or partial carryover application must be submitted under its own unique workflow process.

CERTIFICATION CHECKLISTS

In order to assist manufacturers in submitting a complete certification application package, ARB staff has prepared certification checklists for all applicable mobile source categories (Appendix A). A complete certification application package must include all the applicable elements specified in the corresponding checklist. Carryover and partial carryover applications must include all of the documents required by the certification checklists and the signed carryover or partial carryover application request letter before submittal to a DMS workflow.

As new emission control technologies or regulations are introduced, it may become necessary to add or remove certain elements from the certification checklists. ARB staff will continue to monitor and revise the contents of the certification checklists to assure that the checklist elements will provide sufficient information to verify compliance with the current regulations. The ARB certification webpages will be updated with the current checklist for each respective category.

APPENDIX A

CERTIFICATION CHECKLISTS

Off-Road Compression-Ignition Engine	
√	Checklist
	Signature Letter (FYWC)
	Durability Plan/Report
	Carryacross Table *
	Maintenance Schedule
	AECD *
	Sensors Table *
	SCR Inducement Strategies *
	Description of SCR Catalyst *
	DPF Regen. Strategy *
	Tamper Resistance
	Cover Letter
	Statement of Compliance
	Warranty Statement
	Exhaust Application
	Report of Ammonia Slip Values *
	Label Picture
	Actual Label (FYWC)
	ABT Plan *
	Delegated Assembly Plan *
	NTE Deficiency Declaration *
	Approved Waivers *

FYWC - First Year or When Changed

* - If Applicable

Off-Road Flex Engine	
√	Checklist
	Signature Letter (FYWC)
	Cover Letter
	Statement of Compliance
	Application
	Label Picture
	Actual Label (FYWC)
	ABT Plan *
On-Road Medium/Heavy-Duty Vehicle	
√	Checklist
	Signature Letter (FYWC)
	Maintenance Schedule *
	Cover Letter
	Statement of Compliance
	Warranty Statement
	Evaporative Application
	Exhaust Executive Order
	Delegated Assembly Plan *
	Approved Waivers *

On-Road Heavy-Duty Diesel Engine	
√	Checklist
	Signature Letter (FYWC)
	Durability Plan/Report
	Carryacross Table *
	Maintenance Schedule
	AECD
	Sensors Table
	SCR Inducement Strategies *
	Description of SCR Catalyst *
	DPF Regen. Strategy *
	Tamper Resistance
	Cover Letter
	Statement of Compliance
	Warranty Statement
	Exhaust Application
	Report of Ammonia Slip Values *
	Label Picture
	Actual Label (FYWC)
	Clean Idle label Picture/Actual *
	ABT Plan *
	Delegated Assembly Plan *
	OBD or EMD Approval
	NTE Deficiency Declaration *
	Approved Waivers *

This checklist was prepared on 9/30/13. ARB reserves the rights to modify the checklist as new regulations and/or technologies are introduced.

On-Road Heavy-Duty Otto Engine		Medium Duty Engine (certified using the engine procedure)		Hybrid Heavy-Duty Engine/Vehicle	
√	Checklist	√	Checklist (certified using the engine procedure)	√	Checklist
	Signature Letter (FYWC)		Signature Letter (FYWC)		Signature Letter (FYWC)
	Durability Plan/Report		Durability Plan/Report		Durability Plan/Report
	Carryacross Table *		Carryacross Table *		Carryacross Table *
	Maintenance Schedule		Maintenance Schedule		Maintenance Schedule
	Tamper Resistance		AECD *		AECD *
	Cover Letter		Sensors Table *		Sensors Table *
	Statement of Compliance		SCR Inducement Strategies *		SCR Inducement Strategies *
	Warranty Statement		Description of SCR Catalyst *		Description of SCR Catalyst *
	Exhaust Application		DPF Regen. Strategy *		DPF Regen. Strategy *
	Label Picture		Tamper Resistance		Tamper Resistance
	Actual Label (FYWC)		Cover Letter		Cover Letter
	ABT Plan *		Statement of Compliance		Statement of Compliance
	Delegated Assembly Plan *		Warranty Statement		Warranty Statement
	OBD or EMD Approval		Exhaust Application		Exhaust & Evaporative* Application
	Approved Waivers *		Report of Ammonia Slip Values *		Report of Ammonia Slip Values *
			Label Picture		Label Picture
			Actual Label (FYWC)		Actual Label (FYWC)
			ABT Plan *		Clean Idle label Picture/Actual *
			Delegated Assembly Plan *		ABT Plan *
			OBD or EMD Approval		Delegated Assembly Plan *
			NTE Deficiency Declaration *		Battery Information
			Approved Waivers *		OBD or EMD Approval
					NTE Deficiency Declaration *
					Approved Waivers *

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* - If Applicable

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On-Road Light Duty	
√	Checklist
	Signature Letter (FYWC)
	DMS Workflow
	E-Cert Application*
	Statement of Compliance
	Warranty Statement
	Adjustable Parameters/Tamper Resistance*
	Catalyst Information*
	VECI Label
	EP Label*
	Emission Related Parts List
	AECD*
	Sensor Table*
	NMOG/VEC Compliance Plan
	Justification for Carryover/Carryacross*
	Test Vehicle Description
	Durability/Test Log
	Durability Procedure (Approval Number)*
	DOR Approval*
	Modified Test Procedure*
	Evap Control Sytem Description *
	ECS Description
	Running Loss Fuel Temperature Profile (all models)
	Confirmatory Test*

ZEV	
√	Checklist
	Signature Letter (FYWC)
	DMS Workflow
	E-Cert Application*
	Statement of Compliance
	Warranty Statement*
	VECI Label
	EP Label*
	Test Vehicle Description
	ZEV Application
	Modified Test Procedure*
	Performance Requirements*
	NMOG Compliance Plan
	Confirmatory Test*

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OHRV- NON-COMPLIANT	
√	Checklist
	Signature Letter (FYWC)
	DMS Workflow
	Red Sticker Application
	EPA Competition Exemption
	Pictures

OHRV - COMPLIANT	
√	Checklist
	Signature Letter (FYWC)
	DMS Workflow
	E-Cert Application
	Original Contractual Agreement*
	Statement of Compliance
	Adjustable Parameters/Tamper Resistance
	Catalyst Information*
	VECI Label
	Maintenance Schedule *
	Emission Related Parts List
	Justification for Carryover/Carryacross*
	Test Vehicle Description
	Durability/Test Log
	Test Reports
	CAP*
	Confirmatory Test*

Highway Motorcycle (Class I, II & III)	
√	Checklist
	Signature Letter (FYWC)
	DMS Workflow
	E-Cert Application
	Original Contractual Agreement*
	Statement of Compliance
	Warranty Statement
	Adjustable Parameters/Tamper Resistance
	Catalyst Information*
	VECI Label
	Maintenance Schedule
	Emission Related Parts List
	AECD*
	Justification for Carryover/Carryacross*
	Test Vehicle Description
	Durability/Test Log
	Test Reports
	CAP*
	Confirmatory Test*

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SSIE Exhaust	
√	Checklist
	Certification Application
	Statement of Compliance
	Label Format
	Warranty Language Format
	New mfr documents (FYWC)
	Tamper Resistance Method*
	ABT Plan*
	Emissions Durability/Compliance Plan*
	Auxiliary Cooling Questionnaire

SSIE & LSI <1L Evap	
√	Checklist
	Certification Application
	Statement of Compliance
	Label Format
	Warranty Language Format
	New mfr documents (FYWC)
	Parts list for certified components
	ABT plan (performance based)*

SIME	
√	Checklist
	Certification Application
	Statement of Compliance
	Label Format (Engine, Star, Hang Tag)
	Warranty Language Format
	New mfr documents (FYWC)
	Supplemental Information Sheet
	OBD-m Documentation (S/I only)*
	Corporate Averaging Plan*
	NTE Testing

FYWC - First Year or When Changed

* - If Applicable

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LSI <1L Exhaust	
√	Checklist
	Certification Application
	Statement of Compliance
	Label Format
	Warranty Language Format
	New mfr documents (FYWC)
	Tamper Resistance Method*
	ABT Plan*

LSI >1L Exhaust	
√	Checklist
	Certification Application
	Statement of Compliance
	Label Format
	Warranty Language Format
	New mfr documents (FYWC)
	Supplemental Information Sheet
	Evaporative information
	AECD information*

SIME	
√	Checklist
	Certification Application
	Statement of Compliance
	Label Format (Engine, Star, Hang Tag)
	Warranty Language Format
	New mfr documents (FYWC)
	Supplemental Information Sheet
	OBD-m Documentation (S/I only)*
	Corporate Averaging Plan*
	NTE Testing

FYWC - First Year or When Changed

* - If Applicable

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APPENDIX B
CARRYOVER COVER LETTER

Company Letterhead

Chief
Emissions Compliance, Automotive Regulations and Science Division
California Air Resources Board
9480 Telstar Ave., Suite 4
El Monte, CA 91731

Subject: 20XX Model Year Carryover Application Request

Manufacturer's Name is requesting the Air Resources Board approve the following Carryover Application for _____ (current test group/engine family/evaporative family) based on carryover data from _____ (previous model year test group/engine family/evaporative family) and Executive Order number _____. By signing this letter, *Manufacturer's Name* is certifying that this model year's application package:

1. Includes no change of the emission standards/FELs, regulation requirements, emission characteristics of the engine, or test procedures requirements.
2. The 20XX application package differs from the 20XX-1 application package only by: (please check applicable changes)

- | |
|---|
| <input type="checkbox"/> Model year
<input type="checkbox"/> Test Group/Engine/Evaporative family name (typically the first character)
<input type="checkbox"/> Manufacturer contact information
<input type="checkbox"/> Projected sales data |
|---|

3. All other information in the 20XX application package is identical to the 20XX-1 application package (incorporates all approved running changes to date).
4. The application package is complete and named correctly using the appropriate Document Management System (DMS) file and workflow naming conventions and submitted using the correct workflow process.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

If you have any questions regarding this request, please contact *Manufacturer Representative Name* at *Representative's phone number* or by email at *Representative's email address*.

Sincerely,
Manufacturer Representative's Signature

APPENDIX C
PARTIAL CARRYOVER COVER LETTER

Company Letterhead

Chief

Emissions Compliance, Automotive Regulations and Science Division
California Air Resources Board
9480 Telstar Ave., Suite 4
El Monte, CA 91731

Subject: 20XX Model Year Partial Carryover Application Request

Manufacturer's Name is requesting the Air Resources Board approve the following Partial Carryover Application for _____ (current test group/engine family/evaporative family) based on Partial Carryover data from _____ (previous model year test group/engine family/evaporative family) and Executive Order number _____. By signing this letter, *Manufacturer's Name* is certifying that this model year's application package:

1. Includes no change of the emission standards/FELs, regulation requirements, emission characteristics of the engine, or test procedures requirements.
2. The 20XX application package differs from the 20XX-1 application package only by: (please check applicable changes)

- ☐ Model year
 - ☐ Test Group/Engine/Evaporative family name (typically the first character)
 - ☐ Manufacturer contact information
 - ☐ Projected sales data
 - ☐ Model information (may only add models if the certification emission levels are not changed)
 - ☐ Part numbers (durable to full useful life and no impact on certification emission levels)
 - ☐ Equipment types (i.e. crane, dozer, generator, etc.)

3. All other information in the 20XX application package is identical to the 20XX-1 application package (incorporates all approved running changes to date).
4. The application package is complete and named correctly using the appropriate Document Management System (DMS) file and workflow naming conventions and submitted using the correct workflow process.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

If you have any questions regarding this request, please contact *Manufacturer Representative Name* at *Representative's phone number* or by email at *Representative's email address*.

Sincerely,

Manufacturer Representative's Signature