

## **Comment 1 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020) - 45 Day.**

First Name: Doug

Last Name: Ingram

Email Address: douging@hotmail.com

Affiliation:

Subject: Eliminate Requirements for OBD-II Vehicles

Comment:

Dear Board Members, I believe the entire waiver and Executive Order (EO) process should be exempt for any products fitted to 1996+ OBD-II equipped vehicles. I think the EO process is redundant to already established federal and state laws regulating emissions and emissions oversight. The purpose of these OBD-II systems is to monitor engine and evaporative emissions and flag excessive emissions with fault codes, check engine lights, and even reduced engine performance. The inspection station has the authority to flag and deny emissions certification for any vehicle exceeding emissions. Aftermarket parts installed on OBD-II vehicles already go through this mandated self-inspection monitoring system. Therefore the EO process is redundant red tape and bureaucracy that does nothing that is already in place on every new vehicle sold in California since 1996. However, in order for this OBD-II system to function the software code of the vehicle should not be altered or tampered with as to render the emissions oversight inoperable (other code changes should be permissible). Aftermarket software products that are proven to not alter this oversight code should be allowed and legal with a EO or waiver. Applying this waiver/EO process to "bolt-on" aftermarket parts that are already subject to constant and persistent OBD-II monitoring should no longer be a requirement. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2020-06-10 07:38:17

No Duplicates.

## **Comment 2 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020) - 45 Day.**

First Name: John  
Last Name: Lambert  
Email Address: jlambert@hypertech.com  
Affiliation: HYPERTECH

Subject: procedures for exemption - aftermarket parts - categories  
Comment:

Hello,

First, I want to say thank you for working so diligently to revamp the E.O. process to better serve everyone involved with the exemption process for aftermarket parts. This has been a long time coming, and is a massive undertaking. Your hard work and perseverance is appreciated.

I have seen the latest version of the proposed procedures for exemption outline and would like to recommend a couple of parts for consideration to be added to the named categories.

One is the electronic pedal adjusters. I believe these would fit into Category 8 along with throttle bodies. I believe OBD testing would be sufficient for these devices. When installed these devices would not affect a drive trace emissions because the operator has to adjust his foot position accordingly to follow the trace which negates any change the pedal adjuster has made.

The second I made note of is a recirculating blow-off-valve. I do believe these products should be listed in Category V with other turbocharger intake tract parts that also require no modifications for proper installation. This would not include units that do not recirculate which would require modifications to the vehicle to install.

I hope my recommendations are sensible and helpful. Good luck with this process and please feel free to reach out to me if there is anything I can do to help.

Thank you, John.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2020-06-16 14:36:25

No Duplicates.

**Comment 3 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020) - 45 Day.**

First Name: Marilyn

Last Name: Fuss

Email Address: marilynfuss6@gmail.com

Affiliation: Ms

Subject: ampts2020

Comment:

To whom it may concern (and that is everyone in California),  
Requests for exemptions from various California boards in order to  
allow for longer use of pollutants, particularly exemptions  
relating to ships and trucks, should be illegal. California already  
suffers from too much air pollution  
Sincerely

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2020-06-25 23:35:49

No Duplicates.

**Comment 4 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020) - 45 Day.**

First Name: Steve

Last Name: Cole

Email Address: [steve@tspowersystems.com](mailto:steve@tspowersystems.com)

Affiliation: TTS Inc.

Subject: Comment on ampts2020

Comment:

Please see attached.

Attachment: '[www.arb.ca.gov/lists/com-attach/4-ampts2020-UDMFbARpVGJRNFI9.pdf](http://www.arb.ca.gov/lists/com-attach/4-ampts2020-UDMFbARpVGJRNFI9.pdf)'

Original File Name: colecomment.pdf

Date and Time Comment Was Submitted: 2020-07-14 08:48:01

No Duplicates.

**Comment 5 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020) - 45 Day.**

First Name: Stephen

Last Name: Major

Email Address: swmajor@yahoo.com

Affiliation:

Subject: Cummings R2.8 diesel crate motor

Comment:

Please give the Cummings R2.8 crate motor an EO number. The 2.8 motor is currently a 50 state emissions motor and is used in the Chevrolet Colorado series trucks. Cummings has produced a crate motor, the R2.8, that is being sold in other states. It is consistently achieving mileages of 25 to 30 mpg into the installations of early trucks and jeeps rather than the 7-12 mpg that these older vehicles are currently average. It is a much better alternative than the older gasoline motors that we are currently limping along. This motor swap combined with the option to run a bio diesel from manufactures like Propel fuels would allow me to reduce my pollution and carbon footprint. Cummings has done a great deal of work getting this crate motor to market as well as a lot of work getting the 2.8 turbo diesel to meet all California standards. Please allow this motor into the state for motor swaps. Thank you for your consideration. Stephen Major

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2020-07-15 16:40:57

No Duplicates.

**Comment 6 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020) - 45 Day.**

First Name: Frank

Last Name: Bohanan

Email Address: Non-web submitted comment

Affiliation:

Subject: Comments on ampts2020

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/8-ampts2020-BWdVPFM6WGpROQBh.pdf'

Original File Name: bohanan.pdf

Date and Time Comment Was Submitted: 2020-07-20 14:47:19

No Duplicates.

**Comment 7 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020) - 45 Day.**

First Name: Braden

Last Name: Liberg

Email Address: bliberg@edelbrock.com

Affiliation: Edelbrock-COMP

Subject: Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines

Comment:

Please see the attached file.

Attachment: 'www.arb.ca.gov/lists/com-attach/9-ampts2020-B2IHZQBkUm0DZ1Un.pdf'

Original File Name: Edelbrock-COMP comments to CARB Aftermarket procedures.pdf

Date and Time Comment Was Submitted: 2020-07-20 15:08:17

No Duplicates.

**Comment 8 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020) - 45 Day.**

First Name: David

Last Name: Goch

Email Address: dgoch@wc-b.com

Affiliation: National Mobility Equipment Dealers Assn

Subject: vehicle modifications for the disabled

Comment:

please consider for the procedure revisions

Attachment: 'www.arb.ca.gov/lists/com-attach/10-ampts2020-BWtVPgBkADcCZQRb.pdf'

Original File Name: NMEDA Comment to CARB Regarding Draft Procedures 7-20-2020 (2).pdf

Date and Time Comment Was Submitted: 2020-07-20 20:00:25

No Duplicates.



**Comment 9 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020) - 45 Day.**

First Name: David

Last Name: Goch

Email Address: dgoch@wc-b.com

Affiliation: National Mobility Equipment Dealers Assn

Subject: vehicle modifications for the disabled

Comment:

please consider for the procedure revisions

Attachment: 'www.arb.ca.gov/lists/com-attach/11-ampts2020-VzkAa1M3AzQAZ1QL.pdf'

Original File Name: NMEDA Comment to CARB Regarding Draft Procedures 7-20-2020 (2).pdf

Date and Time Comment Was Submitted: 2020-07-20 20:00:25

No Duplicates.

**Comment 10 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020) - 45 Day.**

First Name: Peter  
Last Name: Treydte  
Email Address: [petert@sema.org](mailto:petert@sema.org)  
Affiliation: SEMA

Subject: Comments Re New AMP Procedures  
Comment:

Please see attachment

Attachment: '[www.arb.ca.gov/lists/com-attach/12-ampts2020-UGJQZgEyWDsFLQU1.pdf](http://www.arb.ca.gov/lists/com-attach/12-ampts2020-UGJQZgEyWDsFLQU1.pdf)'

Original File Name: 2020.07.20 SEMA Board Meeting Comments.pdf

Date and Time Comment Was Submitted: 2020-07-20 22:24:48

No Duplicates.

**Comment 11 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020) - 45 Day.**

First Name: Max

Last Name: Pfeiffer

Email Address: [contact@maxwellvehicles.com](mailto:contact@maxwellvehicles.com)

Affiliation: Maxwell Vehicles

Subject: Zero-Emissions Aftermarket Exemption Procedures

Comment:

Please see attached.

Attachment: '[www.arb.ca.gov/lists/com-attach/13-ampts2020-B2oHYAB5UnYDYFU5.pdf](http://www.arb.ca.gov/lists/com-attach/13-ampts2020-B2oHYAB5UnYDYFU5.pdf)'

Original File Name: maxwell.pdf

Date and Time Comment Was Submitted: 2020-07-21 09:21:54

No Duplicates.

**Comment 12 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020) - 45 Day.**

First Name: Steve

Last Name: Cole

Email Address: [steve@ttspowersystems.com](mailto:steve@ttspowersystems.com)

Affiliation: TTS Inc.

Subject: Email to Board Members

Comment:

Please see attached.

Attachment: '[www.arb.ca.gov/lists/com-attach/14-ampts2020-VjVcNVM+V2ECKlMj.pdf](http://www.arb.ca.gov/lists/com-attach/14-ampts2020-VjVcNVM+V2ECKlMj.pdf)'

Original File Name: cole.pdf

Date and Time Comment Was Submitted: 2020-07-21 09:59:36

No Duplicates.

**Comment 1 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020). (At Hearing)**

First Name: Max

Last Name: Pfeiffer

Email Address: mpfeiffer@maxwellvehicles.com

Affiliation: Maxwell Vehicles

Subject: Comments on Aftermarket Parts Procedures for July 23rd Board Meeting

Comment:

Please see my attached written comments. These are to the effect of the verbal comments I will be making.

Attachment: [www.arb.ca.gov/lists/com-attach/15-ampts2020-WjgFbFY2U3IGZAhX.pdf](http://www.arb.ca.gov/lists/com-attach/15-ampts2020-WjgFbFY2U3IGZAhX.pdf)

Original File Name: Board Meeting Comments Thurs July 23rd - Maxwell Vehicles.pdf

Date and Time Comment Was Submitted: 2020-07-23 09:44:09

No Duplicates.

**Comment 2 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020). (At Hearing)**

First Name: Stanton

Last Name: Saucier

Email Address: Non-web submitted comment

Affiliation: MPower Engineering Inc

Subject: Comments on ampts2020

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/17-ampts2020-AHMCcARkAD1VJwdo.pdf](http://www.arb.ca.gov/lists/com-attach/17-ampts2020-AHMCcARkAD1VJwdo.pdf)

Original File Name: stanton.pdf

Date and Time Comment Was Submitted: 2020-07-23 13:34:23

No Duplicates.

**Comment 1 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020) - 15-1.**

First Name: Keith

Last Name: Cavallini

Email Address: keith@greendieselengineering.com

Affiliation:

Subject: Text clarification on page 21 (c)

Comment:

In the modified text, page 21, section (c), it discusses a manufacturer might need to provide data to compare in-use monitoring performance ratio (IUMPR) data of the OBD system stock vs. modified. Has/is CARB releasing the procedure to run this type of testing? IUMPR is mandated by EPA/CARB, but it is not field monitored to a large degree. Many OEM applications do not meet or are right at the minimum thresholds. It could take many thousand miles of mileage accumulation at various temperatures/altitudes/loads for the ratios to even register and be cost prohibitive and burdensome for small manufacturers of after-market components. The large OEMs have fleets of vehicles dedicated for this type of activity and small companies do not have the same resources.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-12-03 05:34:38

No Duplicates.

**Comment 2 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020) - 15-1.**

First Name: Frank

Last Name: Bohanan

Email Address: fjbgreen-1@yahoo.com

Affiliation: GreenSpeed Automotive

Subject: 15-Day Comments

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/com-attach/19-ampts2020-BjcGNQBeUWYEEYwR9.pdf](http://www.arb.ca.gov/lists/com-attach/19-ampts2020-BjcGNQBeUWYEEYwR9.pdf)

Original File Name: 15 Day Comments.pdf

Date and Time Comment Was Submitted: 2020-12-17 10:02:29

No Duplicates.



**Comment 3 for Procedures for the Exemption of Add-On and Modified Part(s) for On Road Vehicles/Engines (ampts2020) - 15-1.**

First Name: Peter  
Last Name: Treydte  
Email Address: [petert@sema.org](mailto:petert@sema.org)  
Affiliation: SEMA

Subject: Comments Re New AMP Procedures  
Comment:

See Attached.

Attachment: [www.arb.ca.gov/lists/com-attach/20-ampts2020-UWMHMOVdkWDtXfwk4.pdf](http://www.arb.ca.gov/lists/com-attach/20-ampts2020-UWMHMOVdkWDtXfwk4.pdf)

Original File Name: 2020.12.17 Procedures 15day Comments-SEMA.pdf

Date and Time Comment Was Submitted: 2020-12-18 08:18:40

No Duplicates.