



Automotive Performance Products Since 1938

Braden Liberg
18-8-3

Edelbrock highlights:

- 80 year old American company producing automotive aftermarket parts that are **MADE IN USA**. Borne of our nations interest in everything automotive, including racing, hot rod's, and restoration, while leading with full modern emissions compliance. Over 250,000 USA customers per year are loyal to our brand's MADE IN USA history.
 - Headquarters and machining operations in Torrance, California.
 - Aluminum Foundry in San Jacinto California.
 - Other manufacturing in North Carolina.
- **Providing jobs and tax revenue to our states and local areas.**
 - >700 American Employees
- A leader in **emissions compliance** for exhaust emissions with automotive aftermarket parts.
 - **103** California Air Resources Board Executive Orders.
 - **Innovator** in providing US Port Tractor engines that meet tough new emissions.
- Member of the Automotive Aftermarket Industry (SEMA – Specialty Equipment Market Association):
 - Part of a \$44 billion industry with 7100 businesses.
 - Employs over 1 million Americans
 - 92% of SEMA members are considered small businesses.

Specially Produced Motor Vehicle Regulations – SPMV:

Edelbrock fully supports the CARB proposed regulations 13 CCR 2209 concerning Specially Produced Motor Vehicles (SPMV). Edelbrock wants to provide CARB EO Certified engines which **meet modern emissions standards** to vehicles manufactured using Section 206(a) of the Clean Air Act (42 U.S.C. 7525(a)) which was amended to allow replica vehicles to be equipped with a motor vehicle engine. Presently vehicles in this category don't meet any emissions standard (they are exempted under state rules like CA SB-100), and must be assembled by the customer (Kit Cars).

Businesses have made sizable investments in production facilities and are **ready to hire new workers, but they can't** until CARB implements new regulations.

Edelbrock asks that CARB approves the proposed regulations 13 CCR 2209 .

Braden Liberg

Manager, Calibration Engineering

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October 24, 2018

Richard Muradliyan
California Air Resources Board
P.O. Box 8001
9528 Telstar Ave.
El Monte, CA 91731

RE: California proposed certification process for Specially Produced Motor Vehicles (SPMV)

Richard,

Thank you for your work concerning the California proposed certification process for Specially Produced Motor Vehicles (SPMV). Edelbrock LLC is very interested in participating in this program and wants to aid in obtaining an agreement with the California Air Resources Board (CARB). This is in response to a comment request for CARB based on the SPMV Draft Regulation Order for October 25, 2018.

Edelbrock would like to position itself between the interests of major Original Equipment Manufacturers (OEMs) that will supply engines and interests of Small Volume Vehicle Manufacturers (SVMs) that will supply rolling chassis. Edelbrock will take on the responsibility of becoming the engine Manufacturer of Record (MOR).

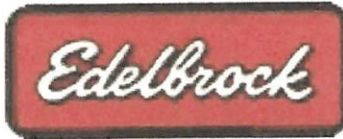
- Edelbrock can offer the OEMs an easier pathway to certification, without significant work load added to the OEM high volume production processes. Edelbrock's experience with Aftermarket and OEM emissions certification process, as well as manufacturing capabilities, make us uniquely qualified to address these issues.
- Edelbrock can offer SVMs emissions certified engines with customized fitment solutions for their application. Edelbrock is presently working with several chassis manufacturers that are interested in these solutions.

Edelbrock believes that by working together with SEMA and CARB, a reasonable approach for a SPMV certification process can be found. Attached you will find comments that we wish to integrate in the CARB regulations. Please feel free to contact me with any questions or comments that you have.

Sincerely,

A handwritten signature in blue ink that reads "Braden Liberg". The signature is written in a cursive, flowing style.

Braden Liberg
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The following is Edelbrock's response to the Draft Regulation Order "CALIFORNIA CERTIFICATION PROCEDURES FOR LIGHT-DUTY ENGINE PACKAGES FOR USE IN NEW LIGHT-DUTY SPECIALLY PRODUCED MOTOR VEHICLES FOR 2019 AND SUBSEQUENT MODEL YEARS", given March 3, 2018.

Edelbrock can produce engines for SPMV's under the proposed rules that have been addressed with CARB staff to reflect the following:

- Elimination of the 1968.2(e)(4.22) evaporative small leak and large leak monitoring requirements as long as a capless fuel fill pipe is used.
- Allowance to report "not complete" for evaporative readiness [1968.2(g)(4.1.3)] as an OBD deficiency.
- Delay implementation of purge check diagnostics until after 2023.
- Eliminate diagnostic requirements for controllers which are not used (e.g. ABS, ESC, Body Control).
- Allow transmission control calibration changes (needed for SPMV mass and N/V ratio changes).
- Allow the following hardware to be modified for fitment into a SPMV chassis:
 - Exhaust system modification:
 - Maintain distances to O2 sensors and catalysts, and orientation of O2 sensors.
 - Maintain thermal characteristics for O2 sensors and catalyst, for light-off and durability.
 - Air intake system modification (allow recalibration if necessary. Maintain equivalent evaporative performance to original system with good engineering judgment).
 - Evaporative system hoses, fuel tanks, and fill tubes (maintain OEM style connections and tubing, or use other non-permeable parts using good engineering judgment).
- Allow large OEM engine manufacturers to submit confidential documentation to CARB on behalf of a small volume engine manufacturer. The small volume manufacturer will be responsible to submit only supplemental documentation for changes made to the SPMV.
 - AECD: The small volume engine manufacturer will submit a supplemental AECD for SPMV.
 - OBD-II defined monitoring conditions: The small volume engine manufacturer will submit a supplemental document for changes made to the SPMV (e.g. disable evaporative diagnostics).
 - Other CARB requested documentation which is confidential to the large OEM manufacturer can be submitted on behalf of the small volume engine manufacturer (e.g. durability documentation). CARB would have the option of using assigned deterioration factors in lieu of having representative information from the large OEM engine manufactures.
- Use the following definition for a SPMV:
 - (17) "Specially produced motor vehicle" or "SPMV" means a newly produced current model year passenger car or light-duty truck, with a gross vehicle weight rating (GVWR) at or below 8,500 pounds, that meets all of the following requirements:
 - (A) Resembles the body of an on-road motor vehicle, on an overall 1:1 scale (+/- 10 percent) of original body lines, excluding roof configuration, ride height, fenders, running boards, grills, hood or hood lines, attachments, and axle location, that had been commercially manufactured for sale not less than 25 years ago, with a production run of at least 50 units, before the manufacture of the current model year motor vehicle.