



July 20, 2020

Kim Pryor  
California Air Resources Board  
9480 Telstar Ave. Suite 4  
El Monte CA. 91731-2988  
CC: Richard Muradliyan, Jackie Lourenco, Allen Lyons

RE: Draft Procedures For Exemption of Add-On and Modified Part(s) For On-Road Vehicles/Engines

Dear Ms. Pryor,

Edelbrock/COMP thanks you for the opportunity to comment on the recently proposed draft Procedures For Exemption of Add-On and Modified Part(s) For On-Road Vehicles/Engines. Edelbrock is supportive of the efforts to update the procedures, and the goals of streamlining the process for issuing executive orders [citing TBL (SB 854, 2018), SEC.12. 43019.3]

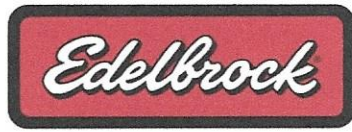
Edelbrock/COMP is an 80 year old American company producing automotive aftermarket parts that are MADE IN USA. Borne of our nations interest in everything automotive, including racing, hot rods, and restoration, while leading with full modern emissions compliance. Over 250,000 USA customers per year are loyal to our brand's MADE IN USA history.

- Headquarters and machining operations in California and Mississippi
- Aluminum Foundries in San Jacinto, California and Sanford, North Carolina
- Edelbrock/COMP is a leader in emissions compliance for exhaust emissions with automotive aftermarket parts.
- A combined 208 California Air Resources Board Executive Orders.
- Innovator in providing US Port Tractor engines that meet tough new emissions.

Edelbrock/COMP believes that by working together with SEMA and CARB, a reasonable approach for the aftermarket executive order process can be found. Comments are provided in the following pages, indexed in the same order as the CARB draft procedures. Please feel free to contact me with any questions or comments that you have.

Sincerely,

Braden Liberg  
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## Comments to DRAFT PROCEDURES FOR EXEMPTION OF ADD-ON AND MODIFIED PART(S) FOR ON-ROAD VEHICLES/ENGINES

### III. APPLICATION SUBMISSION REQUIREMENTS:

#### (d) Vehicle/Engine Coverage Requirements

(1) In order to streamline the EO process for both CARB and the manufacturers, the exceptions for variations in test group and engine family should be expanded to include differences in emissions standards for similar vehicles or engines. For instance, because of emission standard phase-in rules, OEMs will split similar vehicles or engines into different emissions standards.

- For example the GM Full Size Trucks and SUVs have several different variants with different emissions standards in different test groups for the same generation V8 engine packages. All GM Full Size Trucks and SUVs with similar generation V8s should be allowed to be grouped on to the same EO application, even though they may have different emissions standards.

### V. TEST VEHICLE/ENGINE AND TESTING

#### (a) Vehicle/Engine Selection

(1) Referencing the "worst case" test vehicle/engine selection as determined by the Executive officer...

- Please publish the method by which CARB choses the worst case vehicle (i.e. which criteria are more or less important when compared) so that industry can make a determination of the worst case vehicle.
- Can CARB release worst case vehicle lists for popular vehicle applications? For example, predetermine what the worst case vehicle is for V8 GM vehicles up to the latest model year. Maybe by working with SEMA a list of a worst case vehicles which represent a common group of predetermined applications can be made which is accepted by CARB.
- Can a worst case vehicle be determined without need a full EO application? For instance, a proposed vehicle coverage list could be submitted by the manufacturer, and the worst case vehicle can be chosen by CARB.

### VIII. LABELING REQUIREMENTS

- Recommendation. In order to assist the manufactures to track and include the correct information labels with their products, please modify the following (with the italicized and underlined words):
  - The product information label shall contain only the following: one unique product name as listed on the exemption Executive Order, the CARB Executive Order number using the format "CARB D-XXX," and the manufacturer's name and contact information, *and optionally the part number of the product information label itself using a 10 point font or smaller.*