

Sarah Sonora!
16-10-2

November 17, 2016

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: California Air Resources Board "Proposed Amendments to the Evaporative Emission Requirements for Small Off-Road Engines"

Clerk of the Board:

American Honda Motor Co., Inc. submits these comments to the California Air Resources Board (ARB) in regards to the "Proposed Amendments to the Evaporative Emission Requirements for Small Off-Road Engines." Honda supports comments made by the Outdoor Power Equipment Institute (OPEI) and the Truck and Engine Manufacturers Association (EMA).

Honda is the largest manufacturer of engines worldwide for a diverse set of products which includes automobiles, motorcycles, marine engines and power equipment. We sell over 1 million small spark-ignited engines in the United States annually, and we sell our engines to over 1,000 equipment manufacturers which are used in a wide variety of applications.

In the proposed amendments, ARB has removed the carbon canister purge requirement as stated in TP-902, "Test Procedure for Determining Diurnal Evaporative Emissions from Small Off-Road Engines and Equipment" Section 4, "General Summary of Test Procedure." ARB stated that the proposal was to better replicate real world use, however ARB made an arbitrary determination of what occurs in the real world. They have not conducted any testing nor provided any supporting data for this change. In fact, the test procedure also requires a 140-day soak period at 30 degrees Celsius which is not representative of real world, but this was not addressed by ARB or removed from the test procedure.

ARB assumes that 15 minute of engine operation will purge the carbon canister and therefore forced purging would not be necessary. Note that passive purge canisters are not affected by engine operation. They purge when the temperature drops (i.e. when the engine is stored during the night). Active purge canisters are purged by engine operation but there are many different types and sizes of carbon canisters, and in addition there is a wide variety of equipment and models. It is not conclusive at this time if 15 minutes of engine operation will completely purge the carbon canister in all cases. Testing would need to be conducted.


Honda has been engaged with ARB staff through OPEI since September of last year starting with the validation study results and soon thereafter with the May 2016 release of these proposed amendments.

We appreciate ARB staff's engagement with industry however, ARB's intent to better simulate real world by simply removing the carbon canister purge requirement is not appropriate. Because of this, Honda requests that the Board postpone the decision on the proposed amendments until more study is conducted collaboratively with industry and ARB to develop a real world test plan for diurnal evaporative emissions.

Thank you for your time and consideration of these comments. Please contact me directly if you have any questions.

Respectfully,

AMERICAN HONDA MOTOR CO., INC.

A handwritten signature in black ink, appearing to read 'Sarah Somorai', with a large, sweeping loop at the end.

Sarah Somorai, Senior Certification Engineer
Certification & Regulation Compliance
310.781.4044
sarah_somorai@ahm.honda.com