Mercedes Benz: Request for Clarification to proposed OBD II amendments ; 15 day notice period.

To members of the Board,

California Air Resources Board (CARB)

In response to the proposed amendments to Title 13 1968.2, title 13, California Code of Regulations changes made available during the 15 day notice period , on Jan 4, 2013. Mercedes Benz, we would like to submit a proposal for revision of sections pertaining to the below:

1. Diesel NMHC Catalyst Monitoring requirements for feedgas generation
2. Diesel PM Filter Monitoring Requirements for NHMC conversion capability

The major focus of our proposal is to narrow the test out requirement to the directly affected emissions constituent. These requests are a repeat of our comments during the 45 day notice period prior to the board hearing in August 2012.

Thank you for your consideration,

Sincerely

Ashim Manchanda,
Mercedes Benz Research and Development North America, Long Beach CA

.

Jan 22, 2013

Topic 1: Section (f)(1.2.3) NMHC Converting Catalyst Monitoring requirements for feedgas generation-

Mercedes proposes the following changes to (f)(1.2.3)(B) below to clarify that the below test out option for NMHC Catalyst feedgas considers NOx emissions only (and not other emissions constituents)

(B) For 201~~0~~5 and subsequent model year passenger cars, light-duty trucks, and MDPVs certified to a chassis dynamometer tailpipe emission standard and 201~~3~~5 and subsequent model year medium-duty vehicles (including MDPVs) certified to an engine dynamometer tailpipe emission standard, for catalysts used to generate a feedgas constituency to assist SCR systems (e.g., to increase NO_2 concentration upstream of an SCR system), the OBD II system shall detect a malfunction when the catalyst is 25 unable to generate the necessary feedgas constituents for proper SCR system operation. Catalysts are exempt from ***feedgas generation this*** *monitoring if* ***both of the following criteria are satisfied: (1)*** *no malfunction of the catalyst's feedgas generation ability can cause* ***NOx*** *emissions to* ***(1)*** *increase by 15 percent or more of the applicable full useful life standard as measured from an applicable emission test cycle;* ***or and*** *(2)* ***no malfunction of the catalyst's feedgas generation ability can cause NOx emissions to*** *exceed the applicable full useful life standard as measured from an applicable emission test cycle.*

Topic 2: Section (f)(9.2.4): PM Filter Monitoring for NHMC conversion capability

Mercedes proposes the following changes to (f)(9.2.4) to clarify that the below test out option for PM Filter Monitoring considers NHMC emissions only (and not other emissions constituents)

(9.2.4) ***Catalyzed PM Filter:***

(A)*NMHC conversion: For 201~~0~~5 and subsequent model year passenger cars, light-duty trucks, and MDPVs certified to a chassis dynamometer tailpipe emission standard and 201~~3~~5 and subsequent model year medium-duty vehicles (including MDPVs) certified to an engine dynamometer tailpipe emission standard with catalyzed PM filters that convert NMHC emissions, the OBD II system shall monitor the catalyst function of the PM filter and detect a malfunction when the NMHC conversion capability decreases to the point that NMHC emissions exceed the applicable emission levels specified in section (f)(9.2.2)(A). If no failure or deterioration of the NMHC conversion capability could result in a vehicle's NMHC emissions exceeding these emission levels, the OBD II system shall detect a malfunction when the system has no detectable amount of NMHC conversion capability. PM filters are exempt from* ***NMHC conversion capability this*** *monitoring if* ***both of the following criteria are satisfied: (1)*** *no malfunction of the PM filter's NMHC conversion capability can cause* ***NMHC*** *emissions to* ***(1)*** *increase by 15 percent or more of the applicable full useful life standard as measured from an applicable emission test cycle;* ***or and*** *(2)* ***no malfunction of the PM filter's NMHC conversion capability can cause NMHC emissions to*** *exceed the applicable full useful life standard as measured from an applicable emission test cycle.*