  

**SMALL VOLUME MANUFACTURER**

**JOINT COMMENT ON 15 DAY NOTICE**

**ADVANCED CLEAN CAR CARB PROPOSAL**

**March 5, 2012**

This comment is submitted on behalf of Aston Martin Lagonda Limited, Lotus Cars Limited and McLaren Automotive Limited. Each of these companies is classified as a “small volume manufacturer” (SVM) under CARB regulations and is a manufacturer of a very limited number of high performance sports cars. See [www.astonmartin.com](http://www.astonmartin.com); [www.lotuscars.com](http://www.lotuscars.com); [www.mclarenautomotive.com](http://www.mclarenautomotive.com)

We support the proposed changes in CARB’s 15 day notice dated February 22, 2012. The proposed modified text adds clarity to the timing of the FTP and SFTP requirements for SVMs.

**Set forth below is our current understanding of the LEVIII SVM requirements.   Portion in yellow indicates area changed per CARB 15 day notice**

1. ***EXHAUST* LEVIII STANDARDS**

* **FTP FLEET SVM STANDARDS   NMOG+NOx (g/mi)**

|  |  |  |  |
| --- | --- | --- | --- |
| *Model Year* | *NOx+NMOG* | *DURABILITY (FULL USEFUL LIFE)* | *CERTIFICATION FUEL* |
| **Through 2021** | **0.160 (current req.)** | **120k miles** | **Existing** |
| **2022-24** | **0.125 -ULEV 125** | **150k** | **E10** |
| **2025 and +** | **0.070**  **(ULEV 70)** | **150k** | **E10** |

***Particulate Standards for Small Volume Manufacturers.***

* + - *2021 - 2027 model years* -- certify 100 percent of its passenger car vehicle fleet to the 3 mg/mi particulate standard. *2028 and subsequent model years* -- certify 100 percent of its passenger car vehicle fleet to the 1 mg/mi particulate standard
* **CARB agrees to revise and keep updated assigned DFs**
* **SFTP II  STANDARDS**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| *Model Year* | *SVM  Requirements* | | *DURABILITY* | *CERTIFICATION FUEL* |
| **Through 2021** | **SFTP I LEVII existing level** | | **4k miles** | **Existing** |
| **2022+** | **SFTP II ULEV/ULEV70/ULEV50 level** | | **150k miles** | **E10** |
| **US06** | **SC03** |
| ***NMHC+NOx* 0.120 g/mi**  ***CO***  **9.6 g/mi**  ***PM***  **10 mg/mi** | ***NMHC+NOx* 0.070 g/mi**  ***CO***  **3.2 g/mi** |

* **CARB agrees to revise and keep updated assigned DFs**

Composite standards may also be adopted but typically with few test groups, SVMs would tend not to use such

1. **EVAPORATIVE LEVIII  STANDARDS**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| *Model Year* | *SVM REQUIREMENT* | | *DURABILITY* | *CERTIFICATION FUEL* |
| **Through 2021** | **LEVII standard** | | **120k** | **existing** |
| **2022 and +** | **LEVIII standard** | | **150k** | **E10** |
| **Option 1** | | | |  |
| **Running Loss**  **g/mi** | **3 day and 2 day Diurnal / Hot Soak** | | |  |
| **Whole vehicle g/test** | **Fuel Only**  **g/test – see note below** | |  |
| **0.05** | **0.350** | **0.0** | |  |
| **Option 2** | | | |  |
| **Running Loss**  **g/mi** | **Highest Whole Vehicle Diurnal + Hot Soak g/test** | **Canister Bleed Test**  **g/test** | |  |
| **0.05** | **0.300** | **0.020** | |  |
|  |  |  |  |  |

**Note --** In lieu of demonstrating compliance with the fuel-only emission standard (0.0 grams per test) over the three-day and two-day diurnal plus hot soak tests, a manufacturer may, with advance Executive Officer approval, demonstrate compliance through an alternate test plan.

* **CARB agrees to revise and keep updated assigned DFs**
* **Procedure for deduction of background evaporative emissions from full vehicle testing (mirror image of rig testing) continue to be accepted; an important issue to SVMs given SVM usage of composites, leather and larger tires**

Thank you.

Sincerely,

Lance Tunick

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