

CARB WORKSHOP ON LEV III AND GHG

**POSITION OF
SMALL VOLUME MANUFACTURERS**

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Lance Tunick

Vehicle Services Consulting, Inc.

505 570 1845

tunick@vsci.net



ASTON MARTIN



McLaren
AUTOMOTIVE

LEV III -- SVMs request that CARB

EXEMPT SVMs FROM LEV III PHASE-INS

HAVE A SEPARATE AND SPECIFIC SVM LEV III FLEET STANDARD

PROVIDE REALISTIC ANNUALLY-REVISED ASSIGNED DFs AS PART OF THE LEV III RULEMAKING

EVAP -- PROVIDE SVM FLEXIBILITY TO ACCOUNT FOR BODY MATERIAL, ETC; REVISE ASSIGNED DFs

SFTP2 -- HAVE COMPARABLE STRINGENCY WITH FTP; COMPOSITE BASED APPROACH

These requests are consistent with SVM treatment under LEV II and the GHG rule

GHG -- SVMs Also Request Clarification of SVM Section of CARB GHG Rule

1. Define the word “**comparable**” in paragraph 13 CCR 1961.1 a(1)(D)(3)(a), as follows:

Comparable means similar as regards horsepower, horsepower to weight ratio, as well as other factors that the Executive Officer may consider relevant.

- The original Staff Report acknowledged that HP and HP-weight ratio would be PRINCIPAL considerations. Since other considerations may indeed be relevant, additional flexibility is needed.

2. Modify paragraph c to read as follows:

Upon approval of the Executive Officer, if a small volume manufacturer demonstrates a vehicle model **uses an engine and emission control system that is identical to a configuration certified for sale in California by a large volume manufacturer (with a transmission that produces equivalent emissions results)**, those small volume manufacturer vehicle models are exempt from meeting the requirements in paragraphs .a. and b. of this section.

- Requiring that the SVM must use the complete engine and transmission of a large volume manufacturer presents an unreasonable limitation, especially if, from an emission perspective, the transmission can be shown as “equivalent”.