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Agency Secretary

Air Resources Board

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Arnold Schwarzenegger
Governor

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To: All Manufacturers Of Small Off-Road Engines (SORE)

The California Air Resources Board (ARB) has been asked to clarify the evaporative emission certification requirements as they apply to engine manufacturers that sell engines with complete evaporative emission systems (Integrated Engines).

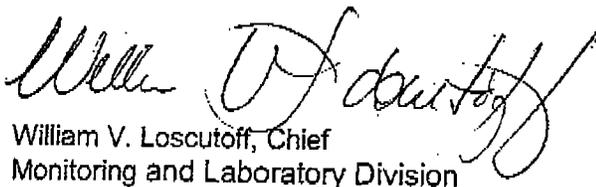
Integrated engines must comply with the evaporative requirements in Title 13 California Code of Regulations Section 2754. The regulations were drafted assuming that integrated engines would be bought by equipment manufacturers and incorporated into lawn and garden equipment during the model year in which they were manufactured. However, since model years vary by engine and equipment manufacturers, some integrated engines may be used in equipment that was produced in a later model year. This has been a normal industry practice that ARB does not want to disrupt.

For example, integrated engines manufactured during the 2006 model year must comply with the new 2006 model year evaporative requirements. However, a few of these integrated engines may be incorporated into 2007 model year equipment. Because the evaporative requirements change substantially in 2007, there is some incentive for engine manufacturers to over produce and "stockpile" 2006 model year engines. These engines would be significantly cheaper to produce and sell than 2007 model year engines, which require a complete evaporative emission system.

In order to prevent intentional stockpiling of 2006 model year engines beyond normal inventory practices, ARB staff will closely monitor the number of 2006 model year engines produced. Should ARB staff determine that engine manufacturers have intentionally stockpiled 2006 model year integrated engines, ARB staff may seek an early hearing to strengthen California's standards.

Thank you for your attention to this matter. If you have questions about this matter, please contact Mr. Jim Watson, Manager, Engineering Development and Testing Section, at (916) 327-1282 or via email at jwatson@arb.ca.gov. The ARB looks forward to your continued cooperation toward meeting the small off-road engine evaporative standards.

Sincerely,


William V. Loscutoff, Chief
Monitoring and Laboratory Division

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <http://www.arb.ca.gov>.

California Environmental Protection Agency