Message

From: Good, David [good.david@epa.gov]
Sent: 4/2/2019 6:30:58 PM
To: Ball, Joel [ball.joel@epa.gov]
Subject: RE: double prep for VW IUVP SULEV vehicles

Thanks Joel

Dave

From: Ball, Joel
Sent: Friday, March 29, 2019 2:48 PM
To: Good, David <good.david@epa.gov>; Yang, Jiacheng@ARB <jiacheng.yang@arb.ca.gov>
Cc: Lang, Robin@ARB <Robin.Lang@arb.ca.gov>; Cicero-Fernandez, Pablo@ARB <Pablo.Cicero@arb.ca.gov>; Wehrly, Linc <wehrly.linc@epa.gov>
Subject: RE: double prep for VW IUVP SULEV vehicles

Hi All,

Regarding preconditioning for IUVP testing the regulations state:

§86.1845-04 Manufacturer in-use verification testing requirements:

(b)(5) *Testing.* (i) Each test vehicle of a test group shall be tested in accordance with the FTP and the US06 portion of the SFTP as described in subpart B of this part, when such test vehicle is tested for compliance with applicable exhaust emission standards under this subpart. Test vehicles subject to applicable exhaust CO_2emission standards under this subpart shall also be tested in accordance with the HFET as described in 40 CFR 1066.840.

subpart B §86.132-96 Vehicle preconditioning.

c)(1) Gasoline- and methanol-fueled vehicles shall be soaked for at least 6 hours after being refueled. Petroleum-fueled diesel vehicles and gaseous-fueled vehicles shall be soaked for at least 1 hour after being refueled. Following this soak period, the test vehicle shall be placed, either by being driven or pushed, on a dynamometer and operated through one Urban Dynamometer Driving Schedule (UDDS), specified in §86.115 and appendix I of this part.

(d) For unusual circumstances where the need for additional preconditioning is demonstrated by the manufacturer, such preconditioning may be allowed with the advance approval of the Administrator.

Ex. 5 Deliberative Process (DP) the guidance letter CD 94-13 **Ex. 5 Deliberative Process (DP)** It states:

The purpose of this letter is to provide manufacturers with additional guidance regarding the 1994-98 model year Alternate Service Accumulation Durability Program (ASADP) which is the Agency' 8 preferred method of demonstrating durability for current certification programs. The regulations applicable to 1994-1998 model years alternative durability programs are found in 40CFR 86.094-13 "Light-Duty Exhaust Durability Programs."

Ex. 5 Deliberative Process (DP)

Regarding sulfur purge preconditioning of tier 3 vehicles, the regulations state:

> **§86.1845-04 Manufacturer in-use verification testing requirements.**
> (a) *General requirements.* (1) Manufacturers of LDV, LDT, MDPV and complete HDV must test, or cause to have tested, a specified number of vehicles. Such testing must be conducted in accordance with the provisions of this section.
> (2) Unless otherwise approved by the Administrator, no emission measurements made under the requirements of this section may be adjusted by Reactivity Adjustment Factors (RAFs).
> (3) The following provisions apply regarding the possibility of residual effects from varying fuel sulfur levels:
> (i) Vehicles certified to Tier 3 standards under §86.1811 must always measure emissions over the FTP, then over the HFET (if applicable), then over the US06 portion of the SFTP. If a Tier 3 vehicle meets all the applicable emission standards except the FTP or HFET emission standard for NMOG + NO_X, and a fuel sample from the tested vehicle (representing the as-received condition) has a measured fuel sulfur level exceeding 15 ppm when measured as described in 40 CFR 1065.710, the manufacturer may repeat the FTP and HFET measurements and use the new emission values as the official results for that vehicle. For all other cases of testing Tier 3 vehicles, measured emission levels from the first test will be considered the official results for the test vehicle, regardless of any test results from additional test runs. Where repeat testing is allowed, the vehicle may operate for up to two US06 cycles (with or without measurement) before repeating the FTP and HFET measurements. The repeat measurements must include both FTP and HFET, even if the vehicle failed only one of those tests, unless the HFET is not required for a particular vehicle. Tier 3 vehicles may not undergo any other vehicle preconditioning to eliminate fuel sulfur effects on the emission control system, unless we approve it in advance.

I hope this helps

Joel Ball
Light-Duty Vehicle Group
Compliance Division
Office of Transportation and Air Quality
United States Environmental Protection Agency
(734) 214-4238
ball.joel@epa.gov

From: Good, David
Sent: Tuesday, March 26, 2019 5:06 PM
To: Yang, Jiacheng@ARB <jiacheng.yang@arb.ca.gov>; Ball, Joel <ball.joel@epa.gov>
Cc: Lang, Robin@ARB <Robin.Lang@arb.ca.gov>; Cicero-Fernandez, Pablo@ARB <Pablo.Cicero@arb.ca.gov>
Subject: RE: double prep for VW IUVP SULEV vehicles

Joey,

Ex. 5 Deliberative Process (DP)

Regards

Dave

From: Yang, Jiacheng@ARB <jiacheng.yang@arb.ca.gov>
Sent: Monday, March 25, 2019 1:22 PM
To: Good, David <good.david@epa.gov>
Cc: Lang, Robin@ARB <Robin.Lang@arb.ca.gov>; Cicero-Fernandez, Pablo@ARB <Pablo.Cicero@arb.ca.gov>
Subject: RE: double prep for VW IUVP SULEV vehicles

Hi Dave,

Thank you for all the information, I appreciate your time on this.

Ex. 5 Deliberative Process (DP)

Thank you

Best,
Joey

From: Good, David <good.david@epa.gov>
Sent: Wednesday, March 13, 2019 3:58 PM
To: Yang, Jiacheng@ARB <jiacheng.yang@arb.ca.gov>; Lyons, Allen@ARB <allen.lyons@arb.ca.gov>; McDuffee, Bill@ARB <Bill.McDuffee@arb.ca.gov>
Cc: Dickerson, Tony@ARB <tony.dickerson@arb.ca.gov>; Pidgeon, Bill <pidgeon.bill@epa.gov>; Lang, Robin@ARB <Robin.Lang@arb.ca.gov>; Cicero-Fernandez, Pablo@ARB <Pablo.Cicero@arb.ca.gov>; Ball, Joel <ball.joel@epa.gov>
Subject: RE: double prep for VW IUVP SULEV vehicles

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Joey,

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Dave

From: Yang, Jiacheng@ARB <jiacheng.yang@arb.ca.gov>
Sent: Wednesday, March 13, 2019 11:11 AM
To: Good, David <good.david@epa.gov>; Lyons, Allen@ARB <allen.lyons@arb.ca.gov>; McDuffee, Bill@ARB <Bill.McDuffee@arb.ca.gov>
Cc: Dickerson, Tony@ARB <tony.dickerson@arb.ca.gov>; Pidgeon, Bill <pidgeon.bill@epa.gov>; Lang, Robin@ARB <Robin.Lang@arb.ca.gov>; Cicero-Fernandez, Pablo@ARB <Pablo.Cicero@arb.ca.gov>
Subject: double prep for VW SULEV vehicles

Morning Gentlemen,

Ex. 5 Deliberative Process (DP)

Thank you for your time!

Best,
Joey

From: Rosenbaeck, Matthias <Matthias.Rosenbaeck@vw.com>
Sent: Tuesday, March 12, 2019 5:11 PM
To: Yang, Jiacheng@ARB <jiacheng.yang@arb.ca.gov>; D'Ambrosi, Tony <Tony.DAmbrosi@vw.com>; Garcia, Oscar <Oscar.Garcia1@vw.com>
Cc: Dickerson, Tony@ARB <tony.dickerson@arb.ca.gov>; Lang, Robin@ARB <Robin.Lang@arb.ca.gov>; Cicero-Fernandez, Pablo@ARB <Pablo.Cicero@arb.ca.gov>
Subject: RE: VW Group of America Annual In-Use Verification Program 2019 - MEETING MINUTES and DOCUMENTS

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Hello Joey –

the letter at the annual cert preview references to EPA's guidance CD-94-13 regarding Alternative Durability Procedures and In-use testing, then called "Reality Check Program". Specifically Attachment II 5d, Acceptable Reality Check program, Emission Test Methods describes **"Double preconditioning cycles may be performed prior to each FTP" as acceptable**.

The guidance confirms to run a double preconditioning for every In-Use vehicle with approval. VWGoA only requested it for SULEV.

The attached letter shows the initial approval from D. Good.

The cert preview letters were mostly addressed to D. Good and Allen Lyons and shared with CARB.
In the annual cert meetings and the cert letter was always acknowledge and not declined by EPA/CARB.

Matthias

From: Yang, Jiacheng@ARB <jiacheng.yang@arb.ca.gov>
Sent: Tuesday, March 12, 2019 6:27 PM
To: Rosenbaeck, Matthias <Matthias.Rosenbaeck@vw.com>; D'Ambrosi, Tony <Tony.DAmbrosi@vw.com>; Garcia, Oscar <Oscar.Garcia1@vw.com>
Cc: Dickerson, Tony@ARB <tony.dickerson@arb.ca.gov>; Lang, Robin@ARB <Robin.Lang@arb.ca.gov>; Cicero-Fernandez, Pablo@ARB <Pablo.Cicero@arb.ca.gov>
Subject: RE: VW Group of America Annual In-Use Verification Program 2019 - MEETING MINUTES and DOCUMENTS

Hi Matthias....

Just want to send you an email as we discussed yesterday.

If you could send me some kind of approval letter from EPA and ARB that allowing the double prep for VW SULEV vehicles...

Thank you!

Best,
Joey

From: Rosenbaeck, Matthias <Matthias.Rosenbaeck@vw.com>
Sent: Thursday, March 7, 2019 10:24 AM
To: Dickerson, Tony@ARB <tony.dickerson@arb.ca.gov>; Lemieux, Sharon@ARB <sharon.lemieux@arb.ca.gov>; Lang, Robin@ARB <Robin.Lang@arb.ca.gov>; Cicero-Fernandez, Pablo@ARB <Pablo.Cicero@arb.ca.gov>; D'Ambrosi, Tony <Tony.DAmbrosi@vw.com>; Garcia, Oscar <Oscar.Garcia1@vw.com>; Wong, Brian@ARB <brian.wong@arb.ca.gov>; Yang, Jiacheng@ARB <jiacheng.yang@arb.ca.gov>; ARB ECARS Events Calendar <ecarsdeventscalendar@arb.ca.gov>
Cc: Fuentes, Mark@ARB <Mark.Fuentes@arb.ca.gov>; Vo, Dustin@ARB <Dustin.Vo@arb.ca.gov>; Ortiz, Alfredo@ARB <Alfredo.Ortiz@arb.ca.gov>; Stoutingburg-Alewine, Vickie@ARB <Vickie.Stoutingburg-Alewine@arb.ca.gov>
Subject: VW Group of America Annual In-Use Verification Program 2019 - MEETING MINUTES and DOCUMENTS

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Robin –

Thanks for yesterday's meeting.

Please see attached the draft version of the meeting minutes for review and comments by 3/14/2019 for final version.

Attached are the presentations with corrected typos and the requested documents.

Thanks,
Matthias

Matthias Rosenbaeck
Engineering and Environmental Office
Manager, In-Use

Volkswagen Group of America, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326

Phone: 248-754-4865
Cell: 248-425-2665
Email: matthias.rosenbaeck@vw.com

-----Original Appointment-----
From: Dickerson, Tony@ARB <tony.dickerson@arb.ca.gov>
Sent: Wednesday, March 6, 2019 11:06 AM
To: Dickerson, Tony@ARB; Lemieux, Sharon@ARB; Lang, Robin@ARB; Rosenbaeck, Matthias; Cicero-Fernandez, Pablo@ARB; D'Ambrosi, Tony; Garcia, Oscar; Wong, Brian@ARB; Yang, Jiacheng@ARB; ARB ECARS Events Calendar
Cc: Fuentes, Mark@ARB; Vo, Dustin@ARB; Ortiz, Alfredo@ARB; Stoutingburg-Alewine, Vickie@ARB
Subject: VW Group of America Annual In-Use Verification Program 2019 Review / IN-PERSON
When: Wednesday, March 6, 2019 11:00 AM-12:30 PM (UTC-08:00) Pacific Time (US & Canada).
Where: ARB Conference Room Small (AN4)

VW Group of America Annual In-Use Verification Program 2019 Review

Organizer: Tony Dickerson 626-459-4350

Call In Number: +1 (888) 538-9546 **Participant Code:** Ex. 6 Personal Privacy (PP)

ECARS Invitees: Sharon Lemieux, Robin Lang, Pablo Cicero-Fernandez, Tony Dickerson, Brian Wong, Joey Yang, Dustin Vo, Alfredo Ortiz, Vickie Stoutinburg-Alwine

Optional: Mark Fuentes

EPA Invitees: none

VW Group of America Attendees: Matthias Rosenbaeck, Oscar Garcia, Tony D'Ambrosi

Meeting Purpose: VW Group of America will be here to discuss their In-Use Verification Program plans for their 2019 Calendar Year IUVP Update.

Following topics will be presented:

- IUVP past year status
- IUVP plan for 2019 CY testing

- IUCP Q7 MY12 solution and time line
- IUVP-TDI test plan

Conference Room: El Monte – CARB Annex 4 Small Conference Room – Wednesday March 6, 2019 from 10:00 to 11:30am.

<< File: 2019-02-09_IUVP_Waiver Request_MY17_MY13.pdf >> << File: VGA IUCP CADXT03.0TLF.pdf >> << File: 2019-03-05_IUVP-TDI_CY2019.pdf >> << File: 2019-03-06_IUVP_CARB_Annual Meeting_190305.pdf >> << File: 2019-03-05_IUVP_Waiver Request_MY13_c.pdf >>