Mercedes-Benz

Application for Certification – Part 1
2010 Model Year

Specific Sections

Test Group
AMBXT03.0U2B

Durability Group:	AMBXDPDNNPP1	
Evaporative Family:	n/a	
EPA Summary Sheet No.:	CSI-AMBXT03[1].0U2B	
Durability Group Description:	Diesel Cycle - Four Stroke - water cooled – piston-diesel – direct injection Pt Oxidation Catalyst (OC) Diesel Particulate Filter (DPF) Selective Catalytic Reduction (SCR) Catalyst	
Test Group Description(s):	3.0 ltr. V6	
Applicable Standards:	Federal state:	Tier 2 (bin 5)
	Calif:	LEV II (ULEV)
Vehicle(s) Covered:	GL350 BLUETEC	
Vehicles Tested: Exhaust:	X164DE30TC – Z9000	
Evap:	n/a	

EPA Response Requested By:

Dr. Andreas Rössler, 734.995.3066

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Revisions:

Issue Date / Revision Date	Affected Pages	Description of Changes
Aug-06-09	all	Initial Version

S-01: Correspondence

(refer to S-01 in common section for a complete list of contacts)

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S-02: Durability Group Description

Please refer to the common application for certification.

S-03: Evaporative/Refueling Family Description

ORVR Testing Waiver per CFR § 86.1810-01 (k) + (m)
Due to the low vapor pressure of diesel fuel and the vehicle tank temperatures, hydrocarbon vapor concentrations are low and the vehicle meets the 0.20 grams/gallon refueling emission standard without a control system.

S-04: Durability Procedure Description

Please refer to the common application for certification.

S-05: Test Group Description

The Test Group Description is provided in section 2 of the common application as part of the durability group description.

S-06: Test Vehicle Description

Vehicle Use	Car Number	Vehicle Type	Engine Displ. [cm^3]	Engine Code	Transm.	ETW [lbs]	Exhaust Emission Control System
EDV-Ex	X164-Z9000	X164D30TC	2987	OM642-30B	L-7	6000	DID/TC/CAC/EGR/OC/DPF/SCR/NOS(2)
DDV-Ex	X164-889	X164D30TC	2987	OM642-30B	L-7	6000	DID/TC/CAC/EGR/OC/DPF/SCR/NOS(2)

S-07: Test Results

S-07-01: Test Vehicle Information

Verify Processing Report**Total Datasets Submitted:** 1
Accepted Datasets: 1
Rejected Datasets: 0

The original datasets are listed below. In addition, any information generated by the Verify system is also included. For any rejected datasets, the reason(s) the dataset was rejected is provided below in the Transaction Report for that particular dataset.

Test Vehicle Information Submission
Test Vehicle Information Details
Information Process Code : N
EPA Manufacturer Code : MBX
Vehicle Identification Text : X164DE30TC-Z9000
Vehicle Configuration Number : 3
Vehicle Configuration Details
Vehicle Description Details
Manufacturer Vehicle Configuration Number : 3
Test Group Name : AMBXT03.0U2B
Model Year : 2010
Actual Test Vehicle Make Text : Mercedes-Benz
Actual Test Vehicle Model Text : GL 350 BLUETEC

Vehicle Fuel Category Identifier : SF
Fuel1 Identifier : D
Fuel2 Identifier : NA
Test Drive Code : R
Shift Indicator Light Usage Identifier : 1
Aged Component Usage Identifier : 4
Odometer Correction Details
Correction Initial Value : 6632
Correction Factor Value : 0.9899
Correction Sign Identifier : -
Correction Units Code : M

Engine Code Text : OM642-30B
Engine Rated Horsepower Value : 210
Engine Displacement Value : 2.987
Air Aspiration Details
Air Aspiration Method Identifier : TC
Air Aspiration Device Count : 1
Air Aspiration Configuration Identifier : N

Charge Air Cooler Identifier : L
Vehicle Specifications Details
Curb Weight Value : 5817
Equivalent Test Weight Value : 6000
Gross Vehicle Weight Rating Value : 6943
NV Ratio Value : 30.2
Axle Ratio Value : 3.7

Transmission Specifications Details
Light Duty Transmission Type Identifier : A
Transmission Lockup Indicator : Y
Transmission Creeper Gear Indicator : N
Transmission Gear Count : 7

Target Set Coefficient Details
Test Procedure Dynamometer Coefficients Category : US06
Target CoefficientA Value : 57.455
Target CoefficientB Value : 0.8764
Target CoefficientC Value : 0.024786
Set CoefficientA Value : 31.586
Set CoefficientB Value : 0.1886
Set CoefficientC Value : 0.030469

Target Set Coefficient Details
Test Procedure Dynamometer Coefficients Category : C-H-E
Target CoefficientA Value : 57.455
Target CoefficientB Value : 0.8764
Target CoefficientC Value : 0.024786
Set CoefficientA Value : 31.586
Set CoefficientB Value : 0.1886
Set CoefficientC Value : 0.030469

Manufacturer Comment Text : Worst Case Tire MY10 Pirelli Scorpion Zero 275/55 R19

EPA Generated Test Vehicle Details
Original Receipt Date : 20090707
Adjusted Loaded Vehicle Weight Value : 6380
Loaded Vehicle Weight Value : 6117

Transaction Status Details
Transaction Status Identifier : ACCEPTED

S-07-02: Test Results

Date: 07/30/2009 10:48:09 AM

Certification Summary Information Report

Manufacturer	Mercedes Benz	**Manufacturer Code**	MBX
Test Group	AMBXT03.0U2B	**Evaporative/Refueling Family**	N/A
Certificate Number	N/A	**CARB Executive Order #**	N/A
Certificate Issue Date	N/A	**Certificate Revision Date**	N/A
Certificate Effective Date	N/A	**Conditional Certificate**	
CSI Revision #	N/A	**CSI Revision Date**	07/30/2009
Model Year	2010		

Test Group Information

CSI Type	Update for Correction	**Running Change Reference Number**	N/A
Drive Source	Combustion Engine	**EPA Vehicle Class**	LDT4
Federal Clean Fuel Vehicle	No	**Federal Clean Fuel Vehicle Standard**	
Federal Clean Fuel Vehicle ILEV	No	**California Partial Zero Emissions Vehicle Indicator**	No
Durability Group Name	AMBXDPDNNPP1	**Durability Group Equivalency Factor**	SRC
Fuel Category	Single Fuel	**Fuel(s)**	Diesel, Not Applicable
Reduced Fee Test Group	No		
Certification Region Codes			
Introduction into Commerce Date	N/A	**CAP2000 Conditional Certificate?**	N/A
Mfr Test Group Comments			
Exhaust/Evap Standards Comments			

Models Covered by this Certificate

Manufacturer	Division	Carline	Certification Region Code	Drive System	Transmission			
					Trans Type	Lockup	Creeper Gear	# of Gears
Mercedes Benz	1 - Mercedes-Benz	422 - GL 350 BLUETEC	Fed	4	A	Yes	No	7
Mercedes Benz	1 - Mercedes-Benz	422 - GL 350 BLUETEC	CA	4	A	Yes	No	7

Engine Description

Hybrid Type		**Hybrid Description**	
Engine Type	4-Stroke Compression Ignition		
Engine Description			
Engine Block Arrangement	V-shaped engine		
Engine Block Arrangement Description			
Basic Fuel Metering Systems(s)	Common Rail Diesel Injection,	**Number of Cylinders/Rotors**	6

Date: 07/30/2009 10:48:09 AM

Certification Summary Information Report

Manufacturer	Mercedes Benz	**Manufacturer Code**	MBX
Test Group	AMBXT03.0U2B	**Evaporative/Refueling Family**	N/A
Certificate Number	N/A	**CARB Executive Order #**	N/A
Certificate Issue Date	N/A	**Certificate Revision Date**	N/A
Certificate Effective Date	N/A	**Conditional Certificate**	
CSI Revision #	N/A	**CSI Revision Date**	07/30/2009
Model Year	2010		

Engine Configuration Number 1

Engine Displacement (liters)	3.0	**Engine Rated Horsepower**	210
Number of Inlet Valves Per Cylinder	2	**Number of exhaust Valves Per Cylinder**	2
Air Aspiration Method	Turbocharged	**Number of Air Aspiration Devices**	1
Air Aspiration Device Configuration	Single	**Charge Air Cooler Type**	Liquid

Cylinder Deactivation Description - N/A

Variable Valve Timing System Description - Allows timing of the intake / exhaust valves to be changed while the engine is in operation

Variable Valve Lift System - N/A

Sensor Information

Number of Knock Sensors	2		
Sensor # 1		**Sensor Type**	Heated oxygen

Sensor Comments - N/A

Exhaust Gas Recirculation	Yes	**EGR Type**	Variable Valve Timing Control
Cooled Exhaust Gas Recirculation	No		
Closed Loop Air Injection System	Yes	**Air Injection Type**	

Engine Configuration Comments - null

After Treatment Device(s) (ATD)

ATD Number	ATD Type	ATD Precious Metal	Substrate Material	Substrate Construction
1	Oxidation catalyst	Platinum	Ceramic	Monolith
2	Diesel Particulate Filter	Platinum + Paladium	Ceramic	Monolith
3	Selective Catalytic Reduction	no precious metal / ferric oxide	Ceramic	Monolith

After Treatment Device (ATD) Comments

Direct Ozone Reduction (DOR) Device Not Equipped

Emission Control Device Comments

Emission Data Vehicle Information

Vehicle ID / Configuration	X164DE30TC-Z9000 / 3		
Transmission Type	Automatic	**# of Transmission Gears**	7
Engine Code	OM642-30B	**Axle Ratio**	3.7
Fuel(s)	Diesel / Not Applicable	**Vehicle Fuel Category**	Single Fuel
Displacement (liters)	2.987	**Rated Horsepower**	210
Equivalent Test Weight (pounds)	6000	**Air Aspiration Method**	Turbocharged
Test Drive Code	2-Wheel Drive, Rear	**SIL Usage**	Not eqipped
Aged Emission Components	4,000 (mi)		

Dynamometer Coefficients Test Procedure: City/Highway/Evap

Dynamometer Target Coefficients	a=57.455 (lbf)	b=0.8764 (lbf/mph)	c=0.024786 (lbf/mph**2)
Dynamometer Set Coefficients	a=31.586 (lbf)	b=0.1886 (lbf/mph)	c=0.030469 (lbf/mph**2)

Dynamometer Coefficients Test Procedure: US06

Dynamometer Target Coefficients	a=57.455 (lbf)	b=0.8764 (lbf/mph)	c=0.024786 (lbf/mph**2)
Dynamometer Set Coefficients	a=31.586 (lbf)	b=0.1886 (lbf/mph)	c=0.030469 (lbf/mph**2)

Test Vehicle Comments

Worst Case Tire MY10 Pirelli Scorpion Zero 275/55 R19

Date: 07/30/2009 10:48:09 AM

Certification Summary Information Report

Manufacturer	Mercedes Benz	**Manufacturer Code**	MBX
Test Group	AMBXT03.0U2B	**Evaporative/Refueling Family**	N/A
Certificate Number	N/A	**CARB Executive Order #**	N/A
Certificate Issue Date	N/A	**Certificate Revision Date**	N/A
Certificate Effective Date	N/A	**Conditional Certificate**	
CSI Revision #	N/A	**CSI Revision Date**	07/30/2009
Model Year	2010		

Test #	AMBX10005441	**Exhaust Test # for this Evap Test**	N/A
Test Procedure	CVS 75 and later (w/o can. load)	**Test Fuel Type**	Cert Diesel 7-15 ppm Sulfur
Test Date	07/22/2009	**DF Type**	Mfr. Determined
4WD Dyno?	No	**State of Charge Delta**	No

Test Comments

For cyclic regenerations of Diesel PC/LDT, MB applies an approved Additive Adjustment Factor (AAF)

Exhaust Standards

Sales Area	Useful Life	Emission Name	Rounded Result	Cert Level	Std	Vehicle Class	Std Level	NMOG / NMHC	RAF	Deterioration Factor Add DF	Deterioration Factor Mult DF	Diesel Adjustment Factor Up	Diesel Adjustment Factor Down	Pass/Fail
Fed	50,000 miles	NOX	0.044	0.04	0.05	LDT4	Federal Tier 2 Bin 5			0.0		0.003	0	Pass
Fed	50,000 miles	CO	0.08	0.1	3.4	LDT4	Federal Tier 2 Bin 5			0.03		0.0047	0	Pass
Fed	50,000 miles	NMOG	0.0033	0.007	0.075	LDT4	Federal Tier 2 Bin 5	1.00		0.0022		0.0006	0	Pass
Fed	50,000 miles	PM	0.003	0.00	0.01	LDT4	Federal Tier 2 Bin 5			0.00003		0.0012	0	Pass
Fed	50,000 miles	HCHO	0.0001	0.000	0.015	LDT4	Federal Tier 2 Bin 5			0.0		0.00001	0	Pass
Fed	120,000 miles	NOX	0.044	0.04	0.07	LDT4	Federal Tier 2 Bin 5			0.0		0.003	0	Pass
Fed	120,000 miles	CO	0.08	0.2	4.2	LDT4	Federal Tier 2 Bin 5			0.07		0.0047	0	Pass
Fed	120,000 miles	NMOG	0.0033	0.010	0.090	LDT4	Federal Tier 2 Bin 5	1.00		0.0055		0.0006	0	Pass
Fed	120,000 miles	PM	0.003	0.00	0.01	LDT4	Federal Tier 2 Bin 5			0.00008		0.0012	0	Pass
Fed	120,000 miles	PM-COMP	0.006	0.01	0.07	LDT4	Federal Tier 2 Bin 5			0.00003		0.0012	0	Pass
Fed	120,000 miles	HCHO	0.0001	0.000	0.018	LDT4	Federal Tier 2 Bin 5			0.0001		0.00001	0	Pass
Fed	120,000 miles	HC-NM+NOX-COMP	0.119	0.12	0.99	LDT4	Federal Tier 2 Bin 5			0.0053		0.0036	0	Pass
CA	50,000 miles	NOX	0.044	0.04	0.05	LDT4	California LEV-II ULEV			0.0		0.003	0	Pass
CA	50,000 miles	CO	0.08	0.1	1.7	LDT4	California LEV-II ULEV			0.03		0.0047	0	Pass
CA	50,000 miles	NMOG	0.0033	0.007	0.040	LDT4	California LEV-II ULEV	1.00		0.0022		0.0006	0	Pass

Date: 07/30/2009 10:48:09 AM

Certification Summary Information Report

Manufacturer	Mercedes Benz	**Manufacturer Code**	MBX
Test Group	AMBXT03.0U2B	**Evaporative/Refueling Family**	N/A
Certificate Number	N/A	**CARB Executive Order #**	N/A
Certificate Issue Date	N/A	**Certificate Revision Date**	N/A
Certificate Effective Date	N/A	**Conditional Certificate**	
CSI Revision #	N/A	**CSI Revision Date**	07/30/2009
Model Year	2010		

Test #	AMBX10005441	**Exhaust Test # for this Evap Test**	N/A
Test Procedure	CVS 75 and later (w/o can. load)	**Test Fuel Type**	Cert Diesel 7-15 ppm Sulfur
Test Date	07/22/2009	**DF Type**	Mfr. Determined
4WD Dyno?	No	**State of Charge Delta**	No
Test Comments			

For cyclic regenerations of Diesel PC/LDT, MB applies an approved Additive Adjustment Factor (AAF)

Exhaust Standards

CA	50,000 miles	HCHO	0.0001	0.000	0.008	LDT4	California LEV-II ULEV		0.0	0.00001	0	Pass
CA	120,000 miles	NOX	0.044	0.04	0.07	LDT4	California LEV-II ULEV		0.0	0.003	0	Pass
CA	120,000 miles	CO	0.08	0.2	2.1	LDT4	California LEV-II ULEV		0.07	0.0047	0	Pass
CA	120,000 miles	NMOG	0.0033	0.010	0.055	LDT4	California LEV-II ULEV	1.00	0.0055	0.0006	0	Pass
CA	120,000 miles	PM	0.003	0.00	0.01	LDT4	California LEV-II ULEV		0.00008	0.0012	0	Pass
CA	120,000 miles	HCHO	0.0001	0.000	0.011	LDT4	California LEV-II ULEV		0.0001	0.00001	0	Pass

Test #	AMBX10005449	**Exhaust Test # for this Evap Test**	N/A
Test Procedure	HWFE	**Test Fuel Type**	Cert Diesel 7-15 ppm Sulfur
Test Date	07/22/2009	**DF Type**	Mfr. Determined
4WD Dyno?	No	**State of Charge Delta**	No
Test Comments			

Exhaust Standards

										Deterioration Factor		Diesel Adjustment Factor		
Sales Area	**Useful Life**	**Emission Name**	**Rounded Result**	**Cert Level**	**Std**	**Vehicle Class**	**Std Level**	**NMOG / NMHC**	**RAF**	**Add DF**	**Mult DF**	**Up**	**Down**	**Pass/Fail**
Fed	50,000 miles	NOX	0.003	0.00	0.07	LDT4	Federal Tier 2 Bin 5			0.0		0.003	0	Pass
Fed	120,000 miles	NOX	0.003	0.00	0.09	LDT4	Federal Tier 2 Bin 5			0.0		0.003	0	Pass
CA	50,000 miles	NOX	0.003	0.00	0.07	LDT4	California LEV-II ULEV			0.0		0.003	0	Pass
CA	120,000 miles	NOX	0.003	0.00	0.09	LDT4	California LEV-II ULEV			0.0		0.003	0	Pass

Date: 07/30/2009 10:48:09 AM

Certification Summary Information Report

Manufacturer	Mercedes Benz	**Manufacturer Code**	MBX
Test Group	AMBXT03.0U2B	**Evaporative/Refueling Family**	N/A
Certificate Number	N/A	**CARB Executive Order #**	N/A
Certificate Issue Date	N/A	**Certificate Revision Date**	N/A
Certificate Effective Date	N/A	**Conditional Certificate**	
CSI Revision #	N/A	**CSI Revision Date**	07/30/2009
Model Year	2010		

Test #	AMBX10005450	**Exhaust Test # for this Evap Test**	N/A
Test Procedure	US06	**Test Fuel Type**	Cert Diesel 7-15 ppm Sulfur
Test Date	07/22/2009	**DF Type**	Mfr. Determined
4WD Dyno?	No	**State of Charge Delta**	No
Test Comments			

Exhaust Standards

Sales Area	Useful Life	Emission Name	Rounded Result	Cert Level	Std	Vehicle Class	Std Level	NMOG / NMHC	RAF	Deterioration Factor Add DF	Deterioration Factor Mult DF	Diesel Adjustment Factor Up	Diesel Adjustment Factor Down	Pass/Fail
Fed	4,000 miles	CO	0.00	0.0	11.8	LDT4	Federal Tier 2 Bin 5					0.0047	0	Pass
Fed	4,000 miles	HC-NM+NOX	0.33	0.3	0.6	LDT4	Federal Tier 2 Bin 5					0.0036	0	Pass
Fed	120,000 miles	CO	0.00	0.1	19.3	LDT4	Federal Tier 2 Bin 5			0.07		0.0047	0	Pass
CA	4,000 miles	CO	0.00	0.0	11.8	LDT4	California LEV-II ULEV					0.0047	0	Pass
CA	4,000 miles	HC-NM+NOX	0.33	0.3	0.6	LDT4	California LEV-II ULEV					0.0036	0	Pass

Test #	AMBX10005454	**Exhaust Test # for this Evap Test**	N/A
Test Procedure	SC03	**Test Fuel Type**	Cert Diesel 7-15 ppm Sulfur
Test Date	07/29/2009	**DF Type**	Mfr. Determined
4WD Dyno?	No	**State of Charge Delta**	No
Test Comments			

Exhaust Standards

Sales Area	Useful Life	Emission Name	Rounded Result	Cert Level	Std	Vehicle Class	Std Level	NMOG / NMHC	RAF	Deterioration Factor Add DF	Deterioration Factor Mult DF	Diesel Adjustment Factor Up	Diesel Adjustment Factor Down	Pass/Fail
Fed	4,000 miles	CO	0.01	0.0	4.0	LDT4	Federal Tier 2 Bin 5					0.0047	0	Pass
Fed	4,000 miles	HC-NM+NOX	0.015	0.02	0.44	LDT4	Federal Tier 2 Bin 5					0.0036	0	Pass
Fed	120,000 miles	CO	0.01	0.1	6.4	LDT4	Federal Tier 2 Bin 5			0.07		0.0047	0	Pass
CA	4,000 miles	CO	0.01	0.0	4.0	LDT4	California LEV-II ULEV					0.0047	0	Pass
CA	4,000 miles	HC-NM+NOX	0.015	0.02	0.44	LDT4	California LEV-II ULEV					0.0036	0	Pass

S-08: Statements

Please refer to the common application for certification.

S-09: OBD-System Information

The OBD approval will be forwarded upon availability.

S-10: Alternate Fuel (if applicable)

This test group does not cover flexible or dedicated alternate fuel vehicles.

S-11: List of AECD

Please refer to S-16 (2) for a detailed description of AECDs including functional explanations.

S-12: Identification and Description of certified vehicles

The identification and description of all vehicles covered by the certificate is given
- in section 02 (common) for exhaust purposes
- in section 03 (common) for evaporative/refueling families.

All appropriate test parameters necessary to conduct an official certification exhaust or evaporative emission test are provided in sections 07 or 17.

S-13: Projected US vehicle sales

Please refer to the common application for certification.

S-14: Request for Certificate

S-14-01: Request for Certificate

Mercedes-Benz requests that EPA issues a certificate of conformity and that ARB issues an executive order for the test group listed on the cover page of this application.

The applicable test results are listed in section 07. The test group complies with all applicable regulations contained within 40 CFR Part 86. The application is current as of this date.

Dr. Ralph Kofler

Note: Compliance statements are listed in the common section 08.

S-14-02: OBD-approval

For OBD approval see confidential section (S-16)

S-14-03: Fee filing form

EPA Form 3520-29 OMB Control No. 2060-0545; approval expiration date: 7/31/2010

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
MOTOR VEHICLE AND ENGINE COMPLIANCE PROGRAM
ON-HIGHWAY FEE FILING FORM
FOR CERTIFICATION APPLICATIONS RECEIVED IN CALENDAR YEAR 2009

Manufacturer Name Mercedes-Benz USA, LLC

Address One Mercedes Drive

City/State/Zip Code/Country Montvale, NJ 07645

On-Highway Certification Request Type (check one)

- ☒ LDV/LDT/MDPV/HDV (Chassis cert) FEDERAL ($34,323)
- ☐ LDV/LDT/MDPV/HDV (Chassis cert) CAL-ONLY ($17,591)
- ☐ HDE (Engine Dyno cert) FEDERAL ($31,685)
- ☐ HDV EVAP-ONLY ($562)
- ☐ HDE CALIF-ONLY ($562)
- ☐ MOTORCYCLE ($1,337)
- ☐ LD/MDPV/HDV ICI ($34,681)

EPA standard engine family or test group or HDV Evaporative family name: A M B X T 0 3 . 0 U 2 B

Amount paid (U.S. Funds Only): $ 34,323

Enter the check number, or the statement AEFT/WIRE# or AEFT/ACH#: 126886

Reduced Fee Section (40 CFR 85.2406)

Reduced fee calculation (minimum initial payment $750): Total number of vehicles/engines covered: ___

Aggregate retail sales price of the vehicles/engines: $ _____ **x 1% = $** _____

Check box if an Independent Commercial Importer: ☐ **List the VIN of imported vehicles/engines below:**

Company Representative: Gary Bowne Signature:

Title: Dept Manager, PCASE Phone/Fax: 201.573.2719 /201.476.2866 Date: 1/23/09

E-mail Address: gary.bowne@mbusa.com

Submission of payments and forms:

(1) Online: **Forms** may be found and/or **payments** may be submitted online at www.Pay.gov.

(2) Send **checks** and this **form** to:

Environmental Protection Agency
Motor Vehicle and Engine Compliance Program
P.O. Box 979032
St. Louis, MO 63197-9000

(3) Transmit offline EFT/Wire **payments** to the New York Federal Reserve Bank. (See Instructions, p.2)

(4) Transmit offline EFT/ACH **payments** to the Federal Reserve Bank of Cleveland. (Instructions, p.2)

(5) **Forms** not submitted under (1) and (2) above can be sent as email attachments to Fees@epa.gov. Forms and payments sent in ways other than the above may be delayed or ineffective. See the Instructions for sending checks and forms by private mail service (e.g., Federal Express).

The public reporting and recordkeeping burden for this collection of information is estimated to average 18 minutes per response. Send comments on EPA's need for this information, the accuracy of the provided burden estimate, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed Form 3520-29 to this address.

This form expires: 1/1/2010

S-14-04: Approval Letters low ash oil

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY
2565 PLYMOUTH ROAD
ANN ARBOR, MICHIGAN 48105-2498

OFFICE OF
AIR AND RADIATION

September 27, 2005

RECEIVED
OCT 07 2005
R. R. MODLIN

Mr. Reginald Modlin
Director, Environmental and Energy Planning
DaimlerChrysler Corporation
800 Chrysler Drive
Auburn Hills, MI 48326-2757
CIMS 482-00-71

Mr. Modlin,

Thank you for your August 30, 2005 letter regarding DaimlerChrysler's desire to use low ash content engine oil to certify your clean light-duty diesel vehicles. As you correctly noted in your letter, EPA Guidance Documents CCD-01-12 (Use of GF-3 Engine Oil in Test Vehicles) and CCD-04-07 (Use of GF-4 Engine Oil in Certification and Fuel Economy Test Vehicles) are the basis for how EPA determines how to deal with unique engine oils with respect to certification and fuel economy testing.

EPA agrees that the use of low ash content engine oil (0.8%) will be beneficial to allowing new advanced particulate filter systems to meet their full potential for performing over the full useful life of the vehicles. Our primary concern with manufacturer's request to certify with unique engine oils is that these oils be readily available to consumers. We realize that the number of light-duty diesel vehicles in the U.S. is low and that the demand for clean light-duty diesel engine oil is also low and that it will be initially difficult to establish widespread distribution of low ash oil.

The plan proposed by DaimlerChrysler for the use and certification of low ash content engine oil, which includes the availability of the low ash engine oil at the 4,300 DaimlerChrysler dealerships in the U.S., the investigation of the potential for making the engine oil available through automotive aftermarket retail chains (Auto Zone, NAPA, etc.) through DaimlerChrysler's MOPAR aftermarket organization, and the continued work with oil manufacturers to market the oil through their outlets and promote the use of the oil at "quick oil change" facilities, appears to be reasonable. Therefore, we are approving DaimlerChrylser's plan to use low ash content engine oil for the certification of light-duty diesel vehicles.

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Please let me know if you any additional questions. You can contact me at 734-214-4286.

Sincerely,

Linc Wehrly
Compliance and Innovative Strategies Division
Office of Transportation and Air Quality

S-15: HEV-specific data (if applicable)

No Hybrid Electric Vehicles (HEV) are part of this test group.