UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF TRANSPORTATION AND AIR QUALITY

August 3, 2000 CCD-00-11 (HD)

Dear Manufacturer:

Subject: Using Condensation Equipment During Raw Emissions Sampling for Nonroad Diesel Engines, and Performing Equipment Calibrations and Checks According to CFR Requirements

Condensation Equipment

Regulations at 40 CFR 89.309(a)(5)(i)(C) require you to use an ice bath or other condensation equipment if you use raw sampling for certification testing of your nonroad engines. We believe that some manufacturers may be using raw sampling systems with no ice bath. If you are gathering certification data using a raw sampling system without an ice bath or other condensation equipment, you must modify your system by January 1, 2001 to comply with the requirements. We will not accept certification data collected on or after January 1, 2001 if you do not use condensation equipment.

Periodic Calibrations and Checks

The regulations at 40 CFR 89 also require you to calibrate your emissions equipment according to certain schedules, and maintain it by periodically verifying performance. Some manufacturers may be calibrating and maintaining their equipment according to requirements in the International Organization for Standardization's (ISO) procedure "8178." These procedures do not match the CFR requirements (40 CFR Part 89, Subparts D and E) for equipment calibration and maintenance, and must not be used if you are gathering EPA certification data in your laboratory. Certification data gathered using improperly maintained equipment is unacceptable.

Please be advised that this letter is intended for informational purposes only and does not absolve any manufacturer of civil liability for violations of 40 CFR Part 89.

Sincerely,

Gregory A. Green, Director
Certification and Compliance Division
Office of Transportation and Air Quality