How EPA’s Emissions Regulations Impact Remanufactured Engines

2013 Remanufacturing Industry Roundtable

by

Dave Morris, MCS

April 11, 2013
Who is MCS?

- MCS is Morris Control Systems, LLC.
- MCS offers products and services for industrial engines.
- Dave Morris, President of MCS, is a control systems and software engineer. Dave has been working with SI and CI engine controls and emissions for 29 years.
- Dave has been working with LSI, SORE, and CI emissions regulations for the past 8 years.
- EPA and ARB certification and liaison services for Large Spark-Ignited (LSI) engines accounts for about half of MCS’ business.
- MCS currently has several industrial engine OEM customers for these services.
Disclaimer

Morris Control Systems, LLC (MCS) has prepared this presentation for the 2013 Remanufacturing Industries Roundtable. Dave Morris of MCS has worked with U.S. EPA (Environmental Protection Agency) and California ARB (Air Resources Board) industrial engine emissions regulations since 2005, and has carefully researched the regulations discussed in this presentation. However, MCS cannot guarantee the accuracy of the information in this presentation, and will not be liable for any costs that the Roundtable participants or any other entities may incur due to errors in this presentation.
We don’t know each other very well.

EPA  Engine Reman Industry
EPA & Engine Remanufacturing Industry

EPA does not have emissions regulations specifically for remanufactured engines.
Emissions Categories for Remanufactured Engines

EPA Emissions Categories

- New
- Replacement
- Reconstructed (Stationary)
- Rebuild

Remanufactured Engine

See hand-out for detailed criteria and requirements.
Current Replacement Engine Regulations

- Replacement engines may be new or remanufactured engines.

- You must be an emissions certificate holder to sell replacement engines.

3 Categories & Key Requirements

1. Previous-tier replacement engines with tracking
   - No suitable current-tier replacement
   - Old engine must be returned or destroyed
   - The old engine may be remanufactured and sold as a rebuild.

2. Previous-tier replacement engines without tracking
   - Limited to 0.5% (1% until 2014) of same category engine production

3. Partially complete current-tier replacement engines
   - No volume limitation
Proposed Changes to Replacement Engine Regulations

EPA has proposed, but not yet enacted, the following changes to 1068.240. EPA is currently soliciting comments from industry and the public.

All Categories
- Replacement engines may not be installed in equipment 25 years old or older.

Previous-tier replacement engines with tracking
- You must check your product line for a suitable previous-tier replacement engine & keep records.
- Old engine block must be sold as a new or replacement engine or destroyed. You cannot use the old block for a rebuilt engine.
THANK YOU!