

A Comprehensive Study of Manufacturers In-Use Testing Data Collected from Heavy-Duty Diesel Engines Using Portable Emissions Measurement System (PEMS)



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U.S. EPA



Overview

- Manufacturer-Run In-Use Testing Program Established in 2005
 - Manufacturers (MFRs) Test Order Selection of Engine Families
 - How Does This Program Work?
- □ In-Use Data Processing and Statistical Analyses to Determine:
 - Vehicle Testing Dates
 - Not-To-Exceed (NTE) Control Area
 - Vehicle Operation
 - Valid NTE Events, and Vehicle-Pass Ratio
 - Overall Average Emissions
 - Heavy-Duty In-Use Testing Details
- Data Summary
- Conclusions and Recommendations
- APPENDIX

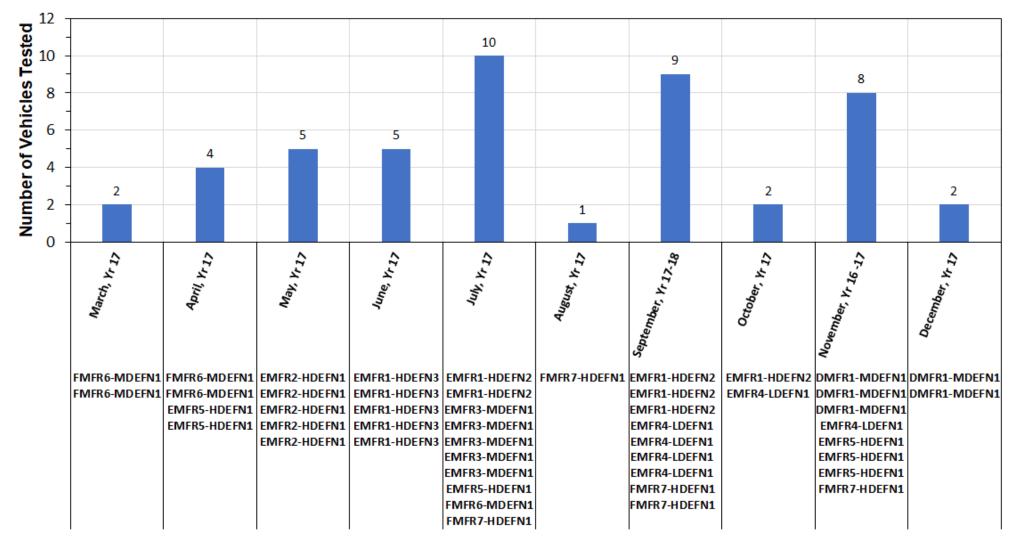


Manufacturers Test Order Selection of Engine Families

- Over any four-year period, EPA will not select more than the average number of engine families that manufacturers have certified over that four-year period. Manufacturers are notified in writing by June 30 of the applicable calendar year about the Test Order, and have 18 months to complete their testing and report results to EPA.
- Selection of engine families is a cooperative effort between EPA and CARB staff, and it's based on information collected from engine certification data, compliance reports, previous in-use testing, and defect and recall reports, etc..
- How does this program work? 40 CFR part 86, Subpart T, provides detailed on manufacturer run in-use testing program.



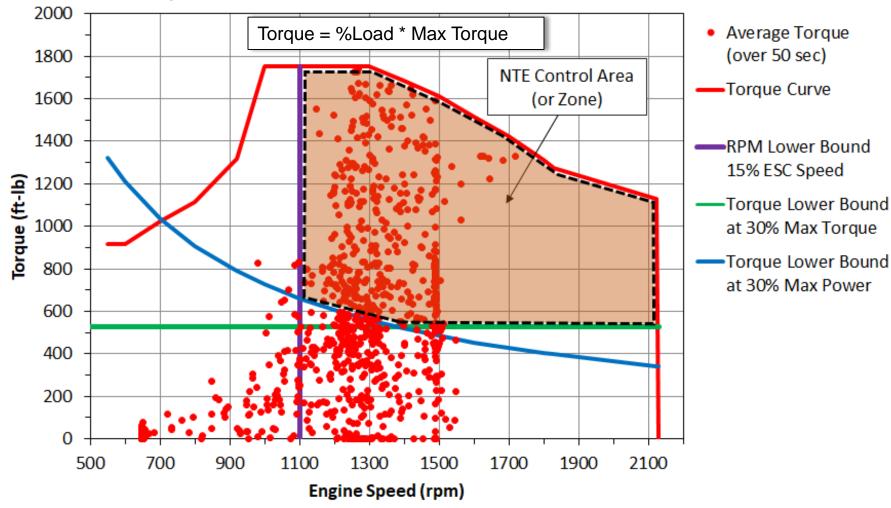
Vehicle, Engine Family and Testing Dates for Manufacturers 2016 Test Order



Test Dates/Engine Family Names



NTE Control Area - Engine Family Name: EMFR1-HDEFN3, Vocational Truck



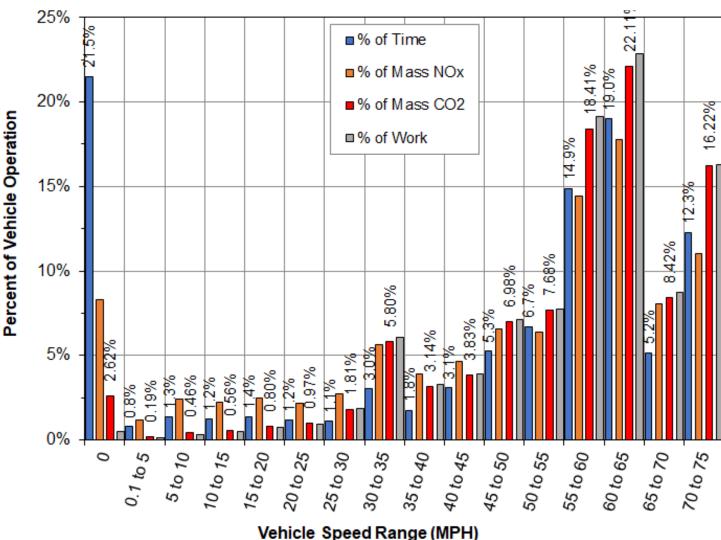
Valid NTE event duration is at least 30 seconds of vehicle continuous operation in the NTE zone with all exclusion set in the current regulation are applied

Each Vehicle has a Distinctive Operation Profile – Engine Family Name: EMFR1-HDEFN3, Vocational Truck

- □ Test Time = 13 hr.
- □ Mass $NO_X = 340 g$
- \square Mass of $CO_2 = 873917 g$
- □ Diesel Fuel = 85.85 gallons
- □ Work = 1727 hp-hr

For 0 - 50 MPH:

- ☐ Mass of NO_x is about 42%
- Mass of CO₂ is about 27%
- ☐ Work is about 25%





Valid NTE Events and Vehicle-Pass Ratio - Engine Family Name: EMFR1-HDEFN3, Vocational Truck

- Calculated and MFR reported Vehicle-Pass Ratios with all exclusions applied as set in the current EPA regulation.
- Percent of emissions, work and diesel fuel inside and outside the NTE control area.

Pass Ratios	Macro	MFR/XML
NTEE Min. Time = 30 sec and at 30% Max. Power	Calculated	Reported
NMHC Pass Ratio:	1.00	1.00
CO Pass Ratio:	1.00	1.00
NOx Pass Ratio:	1.00	1.00
NOx & NMHC Pass Ratio:	N/A	N/A
PM pass ratio:	1.00	1.00
# of NTE Events:	37	38

Emissions Summary NTEE Min. Time = 30 sec, at 30% Max. Power		Total Emissions (g)							Gallon of Diesel Fuel
	Time (sec)	Time (%)	NOx	NMHC	СО	CO2	PM	Work	Fuel
Total Throughout Test:	47,471	100.0%	340.33	5.90	626.85	873,916.64	2.45	1,727.03	85.85
			Percent	of Total	Emissi	ons and Wo	rk		
Percent of:	Time (sec)	Time (%)	NOx	NMHC	СО	CO2	PM	Work	Fuel
Total outside of "Basic" NTE Control Area:	30,080	63.4%	27.3%	64.9%	36.2%	20.6%	63.8%	15.3%	17.65
Total in "Basic" NTE Control Area (w/o exclusions):	17,391	36.6%	72.7%	35.1%	63.8%	79.4%	36.2%	84.7%	68.20
Exclusion 6 (Deficiency):	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Exclusion 7 (EMD/OBD):	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Exclusion 8 (EGR/Cold Temp Operation):	11,563	24.4%	50.9%	18.7%	39.3%	50.3%	17.1%	53.7%	43.15
Exclusion 9 (Aftertreatment/Low Temp Operation):	2,522	5.3%	24.6%	16.8%	8.3%	9.6%	1.7%	10.2%	8.22
Exclusion 10 (Altitude/Amb Temp):	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Exclusion 11 (Zero Check):	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Total in NTE Control Area (w/ exclusions applied):	5,270	11.1%	13.4%	4.2%	22.5%	26.9%	17.9%	28.6%	23.10
Total in NTE Control Area with LTR flag:	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Total in "Basic" NTE w/o excl with Regen flag:	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Total of Valid NTE Events in NTE Control Area:	2,431	5.1%	7.3%	0.7%	10.8%	14.4%	10.3%	15.3%	12.40



Valid NTE Events and Vehicle-Pass Ratio - Engine Family Name: EMFR1-HDEFN3, Vocational Truck

Effect of EGR Cold Temperature (Exclusion) on Valid NTE Events (Turning "off" the EGR Cold Temperature Exclusion):

- EGR cold temperature operation is defined as engine meeting either of the following:
 - Intake Manifold Temp IMT (^OF) ≤ IMT defined in *IMP (bars) = 0.0875 x IMT - 7.75*, or
 - Engine Coolant Temp ECT (°F) ≤ ECT defined in *IMP (bars)* = 0.0778 x ECT - 9.8889

Pass Ratios - No EGR/Cold Temp Operation NTEE Min. Time = 30 sec and at 30% Max. Power	Macro Calculated	MFR/XML Reported
NMHC Pass Ratio:	1.00	1.00
CO Pass Ratio:	1.00	1.00
NOx Pass Ratio:	0.98	1.00
NOx & NMHC Pass Ratio:	N/A	N/A
PM pass ratio:	1.00	1.00
# of NTE Events:	152	38

INIT (Dais) = 0.0776 x ECT = 9.0009										
Emissions Summary - No EGR/Cold Temp Operation NTEE Min. Time = 30 sec and at 30% Max. Power		Total Emissions (g)							Gallon of Diesel Fuel	
	Time (sec)	Time (%)	NOx	NMHC	СО	CO2	PM	Work	Fuel	
Total Throughout Test:	47,471	100.0%	340.33	5.90	626.85	873,916.64	2.45	1,727.03	85.85	
		Percent	of Total	Emissi	ons, Wo	rk and Dies	el Fue			
Percent of:	Time (sec)	Time (%)	NOx	NMHC	СО	CO2	PM	Work		
Total outside of "Basic" NTE Control Area:	30,080	63.4%	27.3%	64.9%	36.2%	20.6%	63.8%	15.3%	17.65	
Total in "Basic" NTE Control Area (w/o exclusions):	17,391	36.6%	72.7%	35.1%	63.8%	79.4%	36.2%	84.7%	68.20	
Exclusion 6 (Deficiency):	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
Exclusion 7 (EMD/OBD):	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
Exclusion 8 (EGR/Cold Temp Operation):	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
Exclusion 9 (Aftertreatment/Low Temp Operation):	2,522	5.3%	24.6%	16.8%	8.3%	9.6%	1.7%	10.2%	8.22	
Exclusion 10 (Altitude/Amb Temp):	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
Exclusion 11 (Zero Check):	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
Total in NTE Control Area (w/o exclusions applied):	14,869	31.3%	48.1%	18.3%	55.5%	69.9%	34.5%	74.5%	59.98	
Total in NTE Control Area with LTR flag:	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
Total in "Basic" NTE w/o excl with Regen flag:	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
Total of Valid NTE Events in NTE Control Area:	8,825	18.6%	31.5%	8.7%	33.5%	45.8%	23.9%	48.8%	39.28	



Vehicle In-Use Test Information - Engine Family Name: EMFR1-HDEFN3, Vocational Truck

Vehicle Test Information and Average Emission Results								
Test Date = June 6, 2017	Average Valid NTEE NOx = 0.09 g/bhp-hr							
Vocaltional Truck Engine Family Name = EMFR1-HDEFN3	Average NOx = 0.19 g/bhp-hr							
Test Identification Code = 191	Average NOx (non-idle) = 0.17 g/bhp-hr							
Start Odometer = 361511 mi	Average NOx outside NTE = 0.20 g/bhp-hr							
End Odometer = 362102 mi	Average Cold NOx = 1.79 g/bhp-hr							
Covered Mileage = 591 mi	Average Idle NOx = 19.5 g/hr							
Shift Day Testing = 13.19 hr	Total Mass NO _X = 340.33 g							
Ambient Temp Range = 53.8 to 82.4 °F	Total Work = 1727 hp-hr							
Average Ambient Temp = 65.93 °F	Gallon of Diesel Fuel = 85.85 gallons							

MFR Reported Standard/FEL, Multiplier, Accuracy Margin, and NTE Threshold	NOx	NMHC	CO	NOx+NMHC	РМ
Standard/FEL	0.31	0.14	15.5	N/A	0.01
Multiplier	1.5	1.5	1.25	N/A	1.5
In use Margin	N/A	N/A	N/A	N/A	N/A
Accuracy Margin	0.15	0.01	0.15	N/A	0.01
Threshold(g/bhp-hr)	0.62	0.22	19.5	N/A	0.03



In-Use Testing Data Statistics – Average Values Calculated from Tested Vehicles

Summary Staistics	Calculated Values
Average Pass Ratio (NOx)	0.98
Max Pass Ratio (NOx)	1
Min Pass Ratio (NOx)	0.84
Number of Vehicles Failed in 2016 Test order	2
Average NOx of Valid NTE Events (g/bhp-hr)	0.10
Average NOx (g/bhp-hr)	0.44
Average NOx Outside NTE Control Zone (g/bhp-hr)	0.66
Average Cold NOx (g/bhp-hr)	2.52
Average NOx (g/mile)	1.04
Total Mass NOx per Test Day (g)	10024
Average Test Duration (hr)	8
Average Covered Mileage (mile)	303
Total Mileage (mile)	13328
Percent Time and Work Outside NTE Zone	67% and 24%
Percent Time and Work in NTE Zone w/o Exclusions	33% and 76%
Percent Time and Work in NTE Zone w/ Exclusions	17% and 39%
Percent Time and Work of Valid NTE Events in NTE Zone	7% and 16%



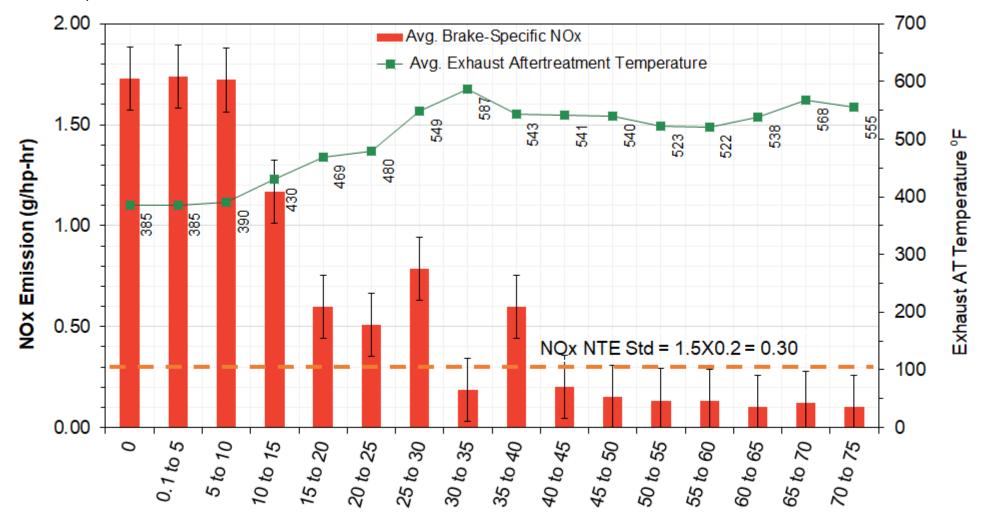
Overall NTE NOx Emission and Average Mass NO_X Per Shift Day Calculated from Tested Vehicles

- □ Average NO_X emissions from valid NTE sampling events are lower than the Standard/FEL NO_X
- Average cold NO_X is always higher than the NTE NO_X

MFR Name	MFR Engine Family	Production Volume for Corresponding	Average Mass NOx per Shift Day	Estimated NOx Production per Shift Day	Standard/ FEL NO _X	Average NO _X	Average NO _X of Valid NTEE	Average NO _X Outside NTE Zone	Average NOx (Non- Idle)	Average NO _X (Idle)	Average Cold NO _X	Distance Specific NO _X
			(g)	(Metric ton)	(g/bhp-hr)	(g/bhp-hr)	(g/bhp-hr)	(g/bhp-hr)	(g/bhp-hr)	(g/hr)	(g/bhp-hr)	(g/mile)
Manufacturer 1 MY2013	DMFR1-MDEFN1	45973	120.52	5.54	0.20	0.67	0.13	0.88	0.59	7.07	1.82	2.28
Manufacturer 1 MY2014	EMFR1-HDEFN2	3178	232.54	0.74	0.20	0.28	0.12	0.59	0.1	43.73	3.87	0.85
Manufacturer 1 MY2014	EMFR1-HDEFN3	42329	450.61	19.07	0.31	0.38	0.07	0.41	0.34	16.67	1.69	1.02
Manufacturer 2 MY2014	EMFR2-HDEFN1	32279	132.23	4.27	0.20	0.25	0.04	0.29	0.12	23	2.81	0.57
Manufacturer 3 MY2014	EMFR3-MDEFN1	2911	104.06	0.30	0.20	0.31	0.08	0.57	0.26	38.81	1.47	0.5
Manufacturer 4 MY2014	EMFR4-LDEFN1	12071	109.23	1.32	0.20	0.56	0.2	0.48	0.34	37.34	2.02	0.52
Manufacturer 5 MY2014	EMFR5-HDEFN1	34196	368.17	12.59	0.20	0.38	0.12	0.54	0.3	73.61	4.05	1.17
Manufacturer 6 MY2015	FMFR6-MDEFN1	7744	110.03	0.85	0.50	0.53	0.08	0.63	0.34	19.31	1.72	0.67
Manufacturer 7 MY2015	FMFR7-HDEFN1	4081	322.82	1.32	0.20	0.61	0.02	1.55	0.13	30.13	3.25	1.78



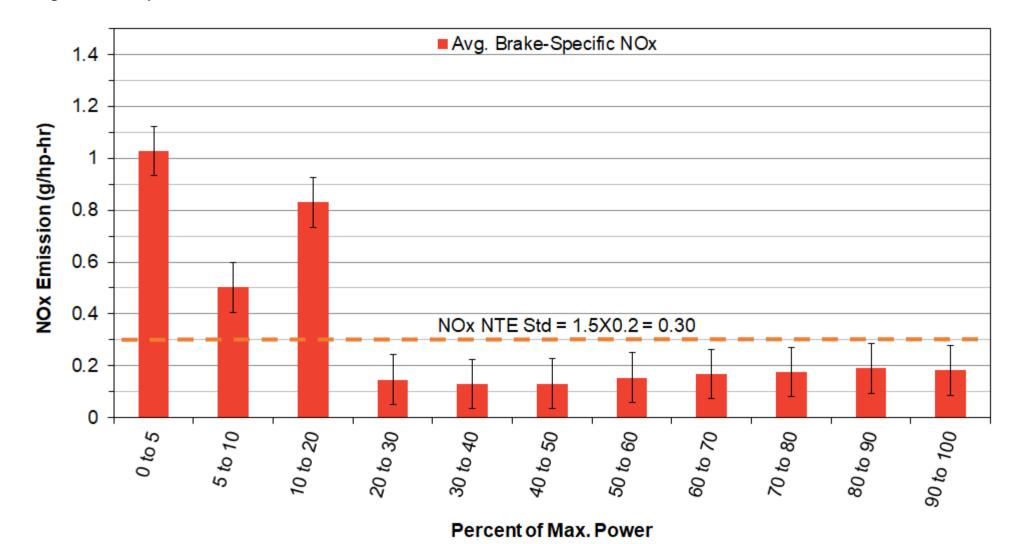
Urban Brake-Specific NOx Emissions are About 3-5 X NTE Standard – Engine Family Name: EMFR1-HDEFN3, Vocational Truck



Vehicle Speed range (MPH)



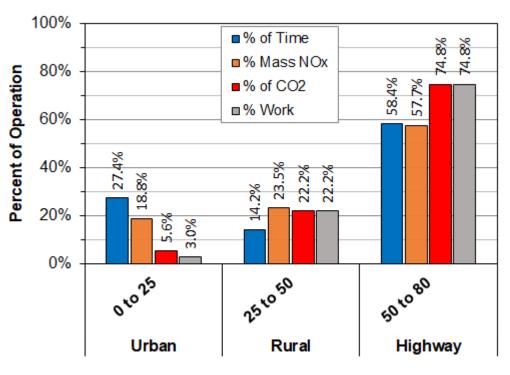
Average Brake-Specific NOx Emissions Increase at Lower Power Especially below 30% of Max Power - Engine Family Name: EMFR1-HDEFN3, Vocational Truck

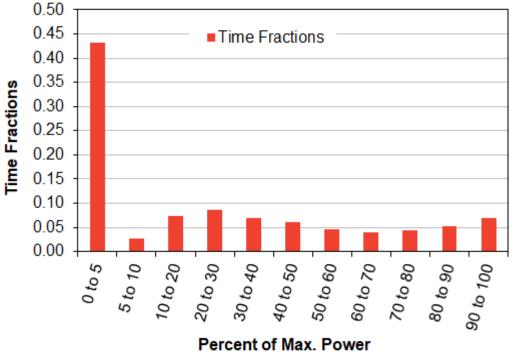




Percent of Time Spent in Urban Driving and Idling - Engine Family Name: EMFR1-HDEFN3, Vocational Truck

- □ Urban + rural driving represent over 40% of the HD NOx emissions time from vehicles
- In real driving low speed and idling are major part of the duty cycles even for line haul and delivery vehicles

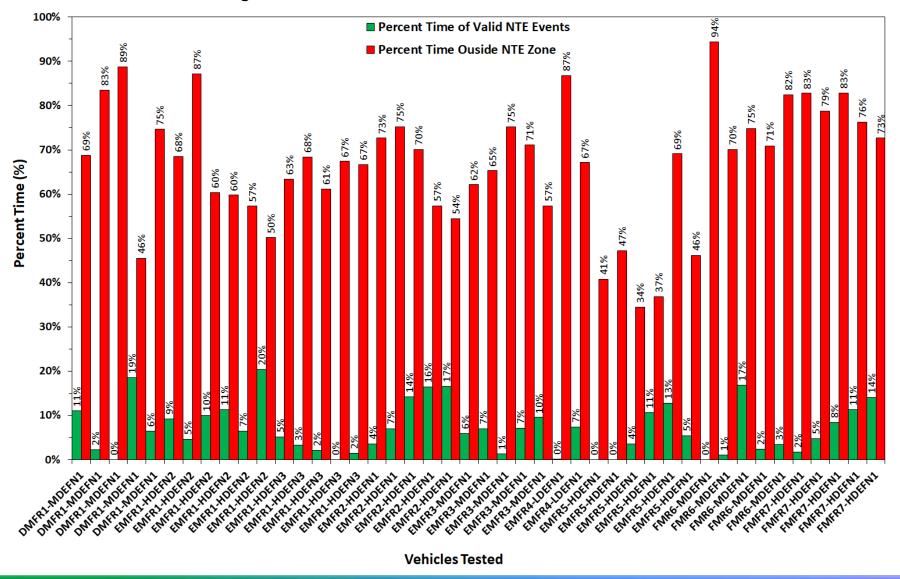




Vehicle Speed Range (MPH)

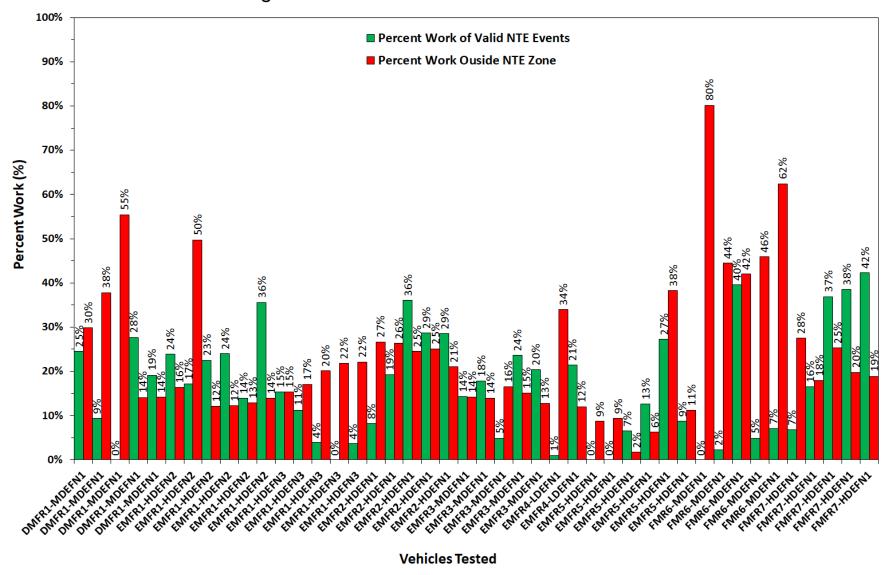


Percent Time of In-Use Testing in Valid NTE Events vs. Outside Valid NTE Events



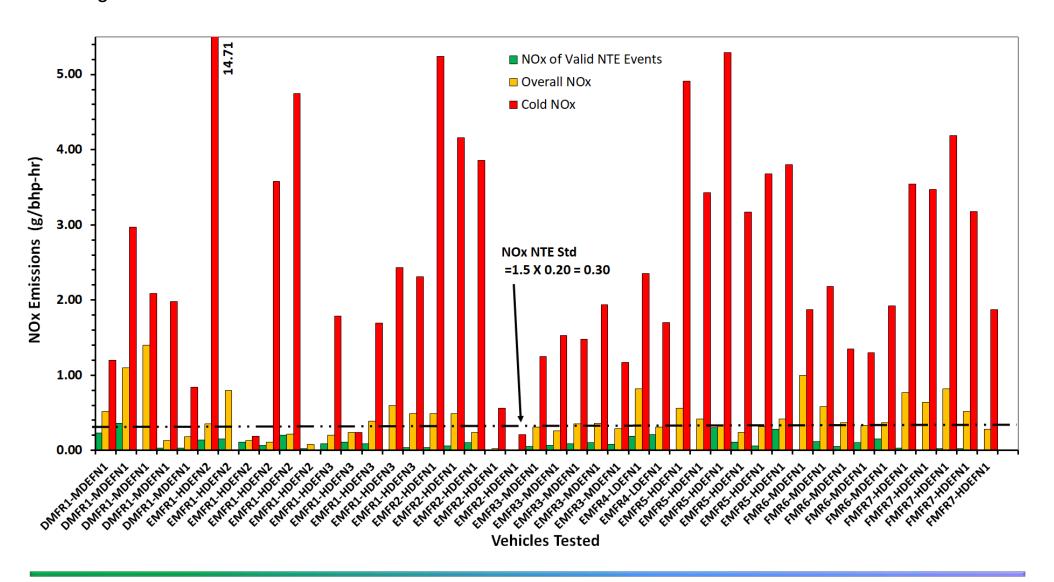


Percent Work of In-Use Testing in Valid NTE Events vs. Outside Valid NTE Events



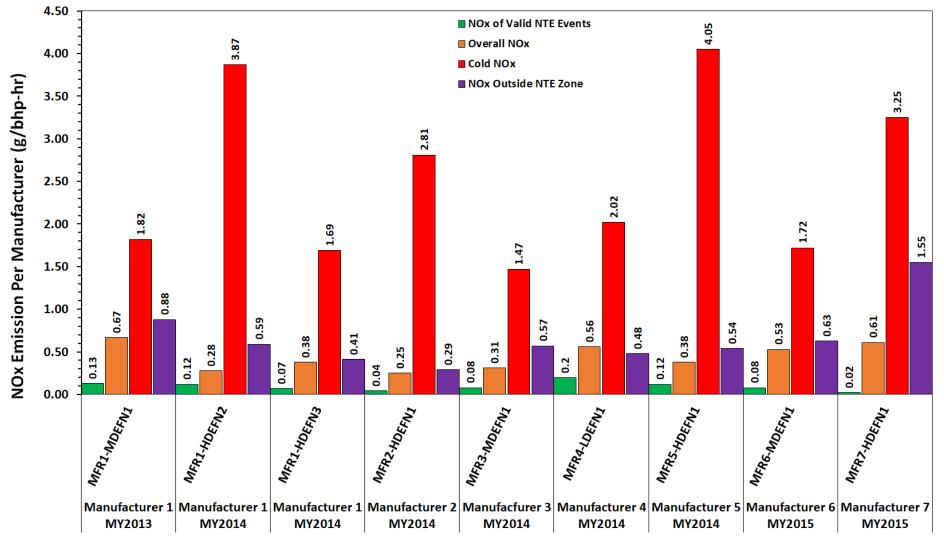


Average NOx Emissions of Valid NTE Events vs. Overall NOx and Cold NOx Emissions





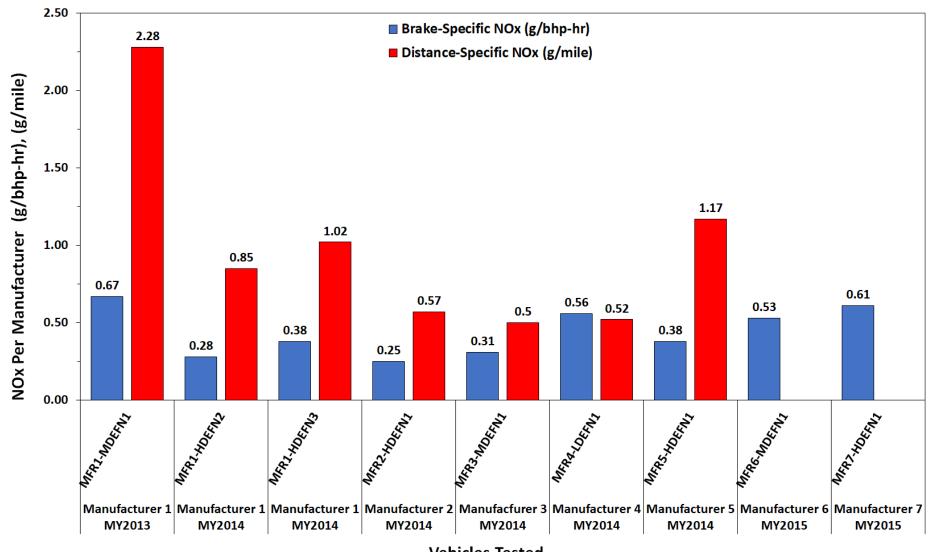
Average Brake-Specific NOx Emissions per Engine Family



Vehicles Tested



Average Brake-Specific vs. Distance Specific NOx Emissions per Engine Family





Summary of Data Submitted for 2012 – 2016 Test Orders

- □ Overall average vehicle pass ratios submitted since 2012.

 - □ CO= 1.0
- □ Percentage of tests meeting or exceeding the 0.90 vehicle-pass ratio threshold since 2012.
 - \square NO_x = 94%
 - □ PM = 100%
 - \Box CO = 100%
- □ Estimated total mileage covered is greater than 200,000 miles.
- □ Manufacturer-Run In-Use Testing Program Data for Heavy-Duty Diesel Engines from 2009 2015 are posted on the EPA website. The data are organized by test order year and have been redacted for Confidential Business Information (CBI). Use the link below to visit the website.

https://www.epa.gov/compliance-and-fuel-economy-data/manufacturer-run-use-testing-program-data-heavy-duty-diesel-3



- Manufacturers in-use testing is important to ensure on-highway heavy duty diesel engines are in compliance with NTE standards and test procedures.
- Engine selection for in-use testing program forced several manufacturers to initiate voluntary recalls due to defects in the after-treatment system and emission control devices.
- In-use emissions testing can positively influencing air quality by ensuring that manufacturers implement emissions control technologies to achieve emissions reduction under real driving conditions including low speeds and loads.
- Recognizing the difference between type-approval engine emissions and in-use emissions results, adding low load data would more realistically reflect real world operation.
- □ In addition, data may more realistically reflect real world emissions if NTE Zone(s) boundaries are modified to include:
 - □ Lower percentage of max. power (e.g., 20%, 10%, etc...), and
 - Cold intake manifold (i.e., removal of exclusion 8).
 - Introduce new NTE multipliers.
- □ Cold-start and idle NOx emissions, almost without exception exceed the NTE emission limits.



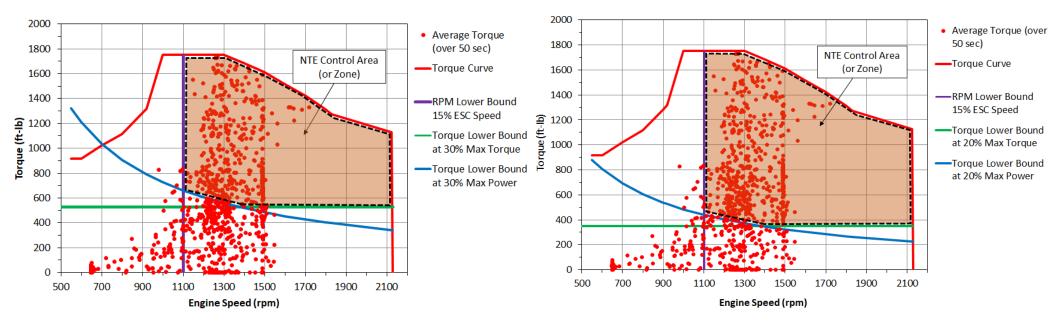
APPENDIX

2024 EMA Proposed NTE In-Use Testing

EMA	EMA Proposal for In-Use Testing Nationwide not Just California (JB, 10/26/2018)										
Standards are in g/bhp-hr	2024			2027 ⁺							
Composite-FTP	0.15			Approximate 50% reduction in real-world in-use NOx							
Steady State RMC	0.15			New Paradigm potentially							
In-Use Program	l .	22 (0.15 g/bhp-hr x 1.5)? e of in-use operations via ex	panded NTE parameters:	utilizing NOx sensors (depending on sensor development and durability)							
		<u>Current</u>	<u>Expanded</u>	and telematics to assess							
	Min event duration	30 sec	aggregate in-use engine family performance								
	Max event duration	10 min or 10x shortest event (600 seconds max)									
	Min Torque	30%	20% of Max Torque								
	Min Power	30%	20% of Max Power								
	Min aftertreatment temp	250 °C	230 °C								
	IMT exclusion (8)	Reduce by 20 °C									
	Continue data gath	ering to support New Parad	ligm in 2027								
OBD Limit	0.40			New Paradigm							
Useful Life	Same as current p	rogram		(LHD, MHD, HHD) TBD							
Certification Fuel	Non-bio fuel only			Non-bio fuel only							



NTE Control Area - Engine Family Name: EMFR1-HDEFN3, Vocational Truck



Current NTE Control Area

Valid NTE event duration is between 30 – 600 seconds of vehicle continuous operation in the NTE zone with all exclusions set in the current regulation are applied

EMA Expanded NTE Control Area

Valid NTE event duration is between 15 to unlimited seconds of vehicle continuous operation in the NTE zone

- EMA is proposing a 0.15 g/bhp-hr national standard
- NTE standard 0.15x1.5= 0.23 g/bhp-hr
- IMT exclusion is reduced by 20 °C (68 °F)



Valid NTE Events and Vehicle-Pass Ratio - Engine Family Name: EMFR1-HDEFN3, Vocational Truck

Pass Ratios for NTEE Min. Time = 15 sec, at 20% Max. Power	Macro Calculated	MFR/XML Reported
NMHC Pass Ratio:	1.00	1.00
CO Pass Ratio:	1.00	1.00
NOx Pass Ratio:	0.93	1.00
NOx & NMHC Pass Ratio:	N/A	N/A
PM pass ratio:	1.00	1.00
# of NTE Events:	379	38

MFR Reported Standard/FEL, Multiplier, Accuracy Margin, and NTE Threshold	NOx	NMHC	со	NOx+NMHC	PM
Standard	0.15	0.14	15.5	N/A	0.01
Multiplier	1.5	1.5	1.25	N/A	1.5
In use Margin	N/A	N/A	N/A	N/A	N/A
Accuracy Margin	0.15	0.01	0.15	N/A	0.01
Threshold(g/bhp-hr)	0.38	0.22	19.5	N/A	0.03

Emissions Summary		Total Work (hp-hr)						
	Time (sec)	Time (%)	NOx	NMHC	СО	CO2	PM	Work
Total Throughout Test	47,471	100.0%	340.33	5.90	626.85	873,916.64	2.45	1,727.03
		Р	ercent c	of Total	Emissio	ns and Worl	k	
Percent of	Time (sec)	Time (%)	NOx	NMHC	СО	CO2	PM	Work
Total outside of NTE Control Area	26,120	55.0%	21.5%	58.4%	27.0%	13.0%	52.5%	7.8%
Total in NTE Control Area (w/o exclusions)	21,351	45.0%	78.5%	41.6%	73.0%	87.0%	47.5%	92.2%
Exclusion 6 (Deficiency)	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Exclusion 7 (EMD/OBD)	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Exclusion 8 (EGR/Cold Temp Operation)	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Exclusion 9 (Aftertreatment/Low Temp Operation)	1,626	3.4%	19.6%	18.8%	5.3%	5.4%	8.9%	5.6%
Exclusion 10 (Altitude/Amb Temp)	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Exclusion 11 (Zero Check)	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total in NTE Control Area (w/ all exclusions applied)	19,725	41.6%	58.9%	22.8%	67.7%	81.6%	38.6%	86.5%
Total in NTE Control Area with LTR flag	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total in "Basic" NTE w/o excl with Regen flag	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total of Valid NTE Events in NTE Control Area	16,825	35.4%	54.7%	18.8%	57.8%	73.8%	35.3%	78.2%



Complete List of Exclusions

Exclusions as Set in the Current Regulations

Set EMD/OBD	Regeneration	Engine Incapable		Deficiency	Time-Weighted	EGR Cold	NOx and NMHC	High Altitude	NTE Zone			
Code	Signal	LTR	Indicator	Encountered	Carve-Out	Temperature	Aftertreatment	Indicator	Indicator			
		Encountered		Indicator	Limited Testing	Operation	Insufficient					
		Indicator			Region	Indicator (8)	Warmup					
					(TWCOLTR)		Indicator (9)					
EMD_Code_Set	Regen_Signal	EI_LTR_Flag	Zero_Check_Flag	Def_Flag	TWCOLTR_Flag	EGR_Cold_Ops_F	Aftertreament_Col	High_Altitude_Flag	NTEZ_Flag			
						lag	d_Ops_Flag					
An indication, if	An indication, if	An indication of	An indication of	An indication of	An indication of			An indication of	An indication of			
available, of	available, of	whether the	whether the	whether the		An indication of	An indication of	whether an engine	whether an engine			
	whether any signal	engine was	analyzer was	engine was		whether an engine	whether an engine	was operating in a				
	from the ECM to	operating in an	performing a	operating under an		· ·	with an	region it considers				
		engine incapable	periodic zero	approved		= Y) was	aftertreatment		(with all			
	a regeneration	limited testing	check. If yes, the	deficiency and if	Carve-Out Limited		device that		exclusions, LTRs,			
(EMD/OBD) code		region (EILTR) or	data recorded at	so which one (as		region of cold	reduces NOx	11(a)(4)(ii)] or not	1.1			
	over the previous	not during the	this second are	numbered in the		temperature	(DE123 = Y) or	during the previous				
•	second. Permitted		unusable for NTE	certification	•	conditions [as per		second. If yes, the	•			
	values: yes, no. If	Exclude the test	calculations.	application) (1, 2,		86.1370-2007(f)]	was operating in a		If No, the data			
The state of the s	yes, the data	point if the engine		3, 4, 5, 6, 7, 8, 9),		or not during the	region of cold	this second are	recorded at this			
,	recorded at this	was operating in		was not operating		previous second.	exhaust gas		second are not to			
appropriate.	second are not to	the area of one or		under an approved		If yes, the data	temperature		be used for NTE			
	be used for NTE	more approved		deficiency (N), or		recorded at this	conditions [as per		calculations.			
	calculations. (The	deficiencies		readings were not		second are not to	86.1370-2007(g)]	All altitudes ≤				
	number of Ys will	(Def_Flag		collected or data		be used for NTE	or not during the	5,500 feet for				
	be counted to	{DE384} = 1 - 9		were not		calculations.	previous second.	T(oF) ≤ -				
	determine the	and MY {DE40} =		evaluated to			If yes, the data	0.00254*A(ft)+				
	length of the	2007 – 2009		determine whether		IMT ≤ IMT found	recorded at this	100				
$\{DE236\} = Y$).	regeneration	indicates that the		the engine		in IMP (absolute	second are not to					
86.1910(b)(3).	event.)	point should be		operated in a		pressure in bars)						
		excluded). 86.007-		deficiency (U),		$= 0.0875 \times IMT($	calculations.					
		11(a)(4)(iv)		during the previous		° F) – 7.75, or						
				second. If		engine coolant	Exclude EGT <					
				exclusions of		temp ≤ ECT	250 °C within 12					
				records are		found in IMP(abs	inches of the					
				claimed based on		bar) = 0.0778 x	outlet of					
				operation in a		ECT(°F) –	aftertreatment					
				deficiency (U)		9.8889	system.					
				cannot be used.		3.0003	_					



Effects of Exclusions on NTE In-Use Testing

Effects of Exclusions 8, 9, Valid NTE Event Duration and % of Max. Power on In-use Testing

			1	2	3	4	5	6	7	8
	Total Shit Day Testing Time = 47,471 sec (13.20 hr.), and Mass NOx = 340.33 (g)	Total Outside of NTE Control Area	Total in NTE Control Area without Exclusions	Exclusion 8: EGR/Cold Temp		Control Area with all Exclusions)	Total of Valid NTE Events in NTE Control Area	Vehicle Pass-Ratio (NOx)	Number of Valid NTE Events	
1	NTEE Min. Time = 30 sec with Exclusions 8 and 9 at 30% Max. Power	Time (sec) Time (%) NOx (%)	30,080 63.4% 27.3%	17,391 36.6% 72.7%	11,563 24.4% 50.9%	2,522 5.3% 24.6%	5,270 11.1% 13.4%	2,431 5.1% 7.3%	1.00	37
2	NTEE Min. Time = 30 sec without Exclusions 8 and 9 at 30% Max. Power	Time (sec) Time (%) NOx (%)	30,080 63.4% 27.3%	17,391 36.6% 72.7%	0 0.0% 0.0%	0 0.0% 0.0%	17,391 36.6% 72.7%	9,854 20.8% 40.8%	0.97	171
3	NTEE Min. Time = 30 sec with Exclusions 8 and 9 at 20% Max. Power	Time (sec) Time (%) NOx (%)	26,120 55.0% 21.5%	21,351 45.0% 78.5%	14,375 30.3% 54.7%	3,689 7.8% 28.2%	6,142 12.9% 13.7%	2,957 6.2% 8.4%	1.00	47
4	NTEE Min. Time = 30 sec without Exclusions 8 and 9 at 20% Max. Power	Time (sec) Time (%) NOx (%)	26,120 55.0% 21.5%	21,351 45.0% 21.5%	0 0.0% 0.0%	0 0.0% 0.0%	21,351 45.0% 78.5%	13,698 28.9% 50.9%	0.96	215
5	NTEE Min. Time = 30 sec with Exclusions 8 and 9 at 10% Max. Power	Time (sec) Time (%) NOx (%)	23,050 48.6% 18.2%	24,421 51.4% 81.8%	16,443 34.6% 56.2%	4,634 9.8% 30.5%	6,913 14.6% 14.0%	3,859 8.1% 9.1%	1.00	64
6	NTEE Min. Time = 30 sec without Exclusions 8 and 9 at 10% Max. Power	Time (sec) Time (%) NOx (%)	23,050 48.6% 18.2%	24,421 51.4% 81.8%	0 0.0% 0.0%	0 0.0% 0.0%	24,421 51.4% 81.8%	18,838 39.7% 60.4%	0.96	266
7	NTEE Min. Time = 1 sec with Exclusions 8 and 9 at 30% Max. Power	Time (sec) Time (%) NOx (%)	30,080 63.4% 27.3%	17,391 36.6% 72.7%	11,563 24.4% 50.9%	2,522 5.3% 24.6%	5,270 11.1% 13.4%	5,270 11.1% 13.4%	0.99	809
8	NTEE Min. Time = 1 sec without Exclusions 8 and 9 at 30% Max. Power	Time (sec) Time (%) NOx (%)	30,080 63.4% 27.3%	17,391 36.6% 72.7%	0 0.0% 0.0%	0 0.0% 0.0%	17,391 36.6% 72.7%	17,391 36.6% 72.7%	0.95	2332
9	NTEE Min. Time = 1 sec with Exclusions 8 and 9 at 10% Max. Power	Time (sec) Time (%) NOx (%)	23,050 48.6% 18.2%	24,421 51.4% 81.8%	16,443 34.6% 56.2%	4,634 9.8% 30.5%	6,913 14.6% 14.0%	6,913 14.6% 14.0%	0.99	939
10	NTEE Min. Time = 1 sec without Exclusions 8 and 9 at 10% Max. Power	Time (sec) Time (%) NOx (%)	23,050 48.6% 18.2%	24,421 51.4% 81.8%	0 0.0% 0.0%	0 0.0% 0.0%	24,421 51.4% 81.8%	24,421 51.4% 81.8%	0.94	2869



Executive Summary

In-use emissions data were collected from 44 heavy-duty (HD) on-highway vehicles that were operated on their representative routes in different states consistent with Not-To-Exceed (NTE) test procedures. These vehicles were selected by EPA and CARB for 2016 Test Order manufacturer run in-use testing program for HD diesel engines from model years 2013- 2015. The selected vehicle classes are light, medium and heavy-duty, with trailers, no trailers, plain closed box, dump trailers, tank and others. All vehicles had engines that were certified to either 0.20, 0.25, 0.31, or 0.50 g/hp-hr NOx standard/family emission limits, and to 0.01 g/hp-hr PM. The NTE limits for these vehicles ranged from 0.45 to 0.90 g/hp-hr.

Our computational and statistical analyses of the in-use data showed that the percent time and work outside the NTE zone are 67% and 24%; in the NTE zone with all exclusions set in the current regulation are 17% and 39%; and without exclusions are 33% and 76% respectively. Consequently, the percent time and work of the valid NTE sampling events are only 7% and 16%. Analyses also revealed that the urban and rural driving represent over 40% of NOx emissions time and the average brake-specific NOx emissions are about 3-4 times the NTE standards. In addition, the brake-specific NOx emissions were significantly higher below 30% of max. power set in the current regulations.

Calculated results showed that the overall average brake-specific NOx from the 44 vehicles ranged from 0.25 to 0.67 g/hp-hr, for NOx outside the NTE zone from 0.29 to 1.55 g/hp-hr, for cold NOx from 1.47 to 4.05 g/hp-hr, and for distance-specific NOx ranged from 0.5 to 2.28 g/mile. For all vehicles, the average NOx emissions from the valid NTE sampling events were lower than the certification values, and the corresponding average vehicle-pass ratio was 98%. Results also indicated that low speed and idling are major part of the duty cycles even for line haul and delivery vehicles.

Finally, without the EGR cold temperature and (NO_X and NMHC) aftertreatment warmup exclusions, the percent time in the NTE zone had remarkably improved, and the vehicle-pass ratio was slightly reduced. Also, changing the valid NTE event duration from 30 to 1 sec, had improved significantly the number of NTE events. In contrast, lowering the percent of maximum power from 30% to 10% had slightly reduced the vehicles-pass ratio. In this study, with all exclusion applied only two vehicles failed the in-use testing and several reported no valid NTE events. However, without applying the EGR cold temperature and (NO_X and NMHC) aftertreatment warmup exclusions more than 10% of the vehicles failed the in-use testing.