



## FAQs regarding 2011 and later CARB & EPA fuel system evaporative compliance for Cummins Onan towable generator installations

### Background

**Q. What do I need to know regarding 2011 / 2012 fuel system evaporative requirements for US EPA towable RV genset installations?**

**A.** Effective January 1, 2011 for Class 2 engines >225cc and January 1, 2012 for Class 1 engines < 225cc the US EPA are requiring that most small, off-road engines less than 25 hp installed in towable RV and towable utility applications meet fuel system evaporative emission standards.

**Q. Why is EPA making these changes?**

**A.** Both US EPA and CARB has determined that small off road spark ignited engines are significant contributors to fuel evaporative emissions. California first implemented regulations of this type on the fuel system in 2007 and 2008 on Class 1 and 2 engines. US EPA is implementing similar regulations in 2011 and 2012.

### Rules

**Q. Where can I go to find specific information regarding EPA and CARB rules?**

**A.** Visit the EPA website at [www USEPA.gov](http://www USEPA.gov) or CARB website at [www.arb.ca.gov](http://www.arb.ca.gov) for complete, up-to-date regulations and insight regarding the legitimate sales of Towable RVs equipped with installed gasoline engine-generators.

**Q. Are installations the same or similar for EPA 49-state and CARB applications.**

**A.** Yes. Cummins Onan evaporative genset models will be approved for both US EPA and CARB. Specific installation requirements must be followed by the towable OEM to meet the compliance requirements of the agency.

**Q. Can a minor component be changed from the system tested and approved by EPA and CARB?**

**A.** No Exceptions.. A new EPA certification and Executive Order (E.O.) is required for any change.

**Q. Do either diesel or L.P. gensets require conformance to the EPA and CARB regulations?**

**A.** No. Only gasoline powered models require qualification.

**Q. Who is responsible for completing the fuel system installation?**

**A.** The certificate holder, Cummins Onan, is responsible for communication to the equipment producer of the finished product for the terms of the compliance with the EPA and CARB executive order for Cummins Onan gensets and providing assembly guidelines to all OEMs to promote proper system installations.

- It is the responsibility of the towable equipment manufacturer OEM to complete the installation of the evaporative fuel system exactly as specified in the CARB EO & EPA certification for the Cummins Onan product being installed. These requirements are detailed in the installation manual. Any deviations from this installation procedure will forfeit the emission certification on the fuel system and transfer engine evaporative emission certification responsibility to the trailer equipment manufacturer / OEM per CFR 40 Part 1060.

**Q. What rules are different when a dealer (not an OEM) installs a generator in a towable?**

**A.** There is no difference. The dealer or any other service center has the same obligations as an OEM to select and install generators and fuel system components per EPA and CARB requirements.

## Solution

### **Q. Who can own an Executive Order / Evaporative Certificate?**

**A.** Any company or individual who successfully passes testing that satisfies EPA or CARB requirements for a specific single component or a specified whole system can be awarded an Executive Order by EPA or CARB.

### **Q. Which Cummins Onan gensets have evaporative emission certification?**

**A.** Models of 2.8kW EVAP, 4kW EVAP, 5.5kW EVAP and 7kW EVAP are available meeting the evaporative certification requirements of CARB and EPA.

### **Q. Can more than one individual or company have a certificate for the same system component?**

**A.** Yes. For instance, Cummins is the certificate holder for the 2.8 EVAP System which includes a specific genset, vapor canister, approved hose and fittings and a metal fuel tank. In addition, a separate E.O. or EPA certificate may be awarded to a metal tank manufacturer who successfully passed required testing for a system that specifies the same Cummins Onan genset.

- However if two certificates exist on the fuel system installation, both EO / certifications must not conflict with each other. (fuel tank, vapor canister, hose and engine must match)

### **Q. Does Cummins Onan have fuel tanks for sale to satisfy EPA and CARB requirements?**

**A.** No. The Cummins Onan system requires the use of a metal tank meeting CARB and EPA requirements. The tank is to be purchased separately or manufactured by other suppliers

### **Q. Does the genset require a dedicated fuel tank?**

**A.** No, the evaporative certification applies to both dedicated fuel tanks and combination tanks which supply the genset and also provide fuel for auxiliary equipment such as ATVs or motorcycles. The gallon capacity of the fuel tank must match the gasoline fuel volume defined in the certification.

### **Q. How does Cummins Onan provide instructions for an EVAP system?**

**A.** Each EVAP Genset Instruction Manual includes a supplement with specific information relative to the unique aspects of that model. See Supplement Next Page.

### **Q. Who manufactures EPA and CARB-compliant fuel tanks**

**A.** Here are a few companies that manufacture metal RV fuel tanks for towables.

#### **ECI Metal Fabrication**

3821 Grapevine Street  
Mira Loma, CA 91752  
Tel. 951-685-8602

#### **Standard Technologies**

2650 West Hays Ave.  
Fremont, OH 43420  
Tel. 419-332-6434

#### **Transfer Flow**

1444 Fortress St.  
Chino, CA 95973  
Tel. 1-800-442-0056

## Enforcement

### **Q. Who is responsible for any deviations from the components and installation as defined by the EPA certificate and CARB Executive Order for a particular towable generator system?**

**A.** As stated previously, it is the responsibility of the towable equipment manufacturer OEM to complete the installation of the evaporative fuel system exactly as specified in the CARB EO & EPA certification for the Cummins Onan product being installed. These requirements are detailed in installation manuals for evap products. Any deviations from this installation procedure will forfeit the emission certification on the fuel system and transfer engine evaporative emission certification responsibility to the trailer equipment manufacturer / OEM per CFR 40 Part 1060.

If purchasing a complete or partial fuel system kit or components from a third party fuel system manufacturer, the requirements of this Cummins installation bulletin shall be met and the system must be verified by the OEM & fuel system supplier as meeting these requirements before completing the installation.

Any construction deviations from these assembly requirements would invalidate the evaporative certification per CFR 40 Part 1060 & CCR Article 1, Chapter 9, Division 3 Title 13 sections 2400 through 2773 and the towable equipment OEM would then be responsible for recertification of the fuel system with California Air Resources Board and US EPA. Uncertified deviations in the assembly could result in penalty or fine by CARB and EPA.

**Q. If a towable is converted by a dealer or service center to add a new generator and fuel system, is evaporative fuel system certification required?**

**A.** Yes, the dealer making the conversion would be potentially liable. CARB and EPA will hold the installer and potentially OEM responsible for management of their sales channel. The dealer is responsible for compliance regulations that forbid selling non-compliant product. **Consult your attorney for advice on specific circumstances.**

**Q. Are there any actual instances of emissions violators being fined by CARB?**

**A.** Yes. For example, custom motorcycle manufacturer, Jesse James was fined a reported \$271,250. Several other nationally-known companies have also been fined for compliance violations.

**Q. Will the generator models I need for 50 state production be available from Cummins Onan as EPA requirements go into effect on January 1, 2011?**

**A.** OEMs will help assure genset availability by making generator model decisions early in September 2010. Simply advise your Cummins Onan sales contact of your intentions relative to the mix of Evap and Standard (Non-Evap) gasoline models. Remember, motorized RVs can continue to use the Non-evap models.

### **Notification of Evaporative Fuel System Compliance Responsibility for Cummins Onan Generator Sets.**

**Completing the installation of the genset evaporative fuel system is required for most towable or similar generator set applications where on-board gasoline fuel storage is self-contained in the trailer equipment.**

**It is the responsibility of the towable equipment manufacturer OEM to complete the installation of the evaporative fuel system exactly as specified in the CARB EO & EPA certification for the Cummins Onan product being installed. These requirements are detailed in the attached procedure below. Any deviations from this installation procedure will forfeit the emission certification on the fuel system and transfer engine evaporative emission certification responsibility to the trailer equipment manufacturer / OEM per CFR 40 Part 1060.**

**If purchasing a complete or partial fuel system kit or components from a third party fuel system manufacturer, the requirements of this Cummins installation bulletin shall be met and the system must be verified by the OEM & fuel system supplier as meeting these requirements before completing the installation.**

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