

ISSUE NUMBER

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ISSUE NAME

Inspection Bulletin 2017-05 FMCSA RE: FMCSA Guidance on Engine Year

STATUS

Closed

Driver-Traffic Enforcement Committee

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With the implementation of Electronic Logging Devices (ELDs) there has been an increase in the number of driver's and carriers utilizing pre-2000 engines in their post 2000 tractors in an attempt to avoid the ELD requirement. CVSA bulletin 2017-05-ELDs (Page 1, & Page 9-12) speaks to this issue but doesn't not specifically answer how remanufactured engines should be treated.

Detroit Diesel offers customers an option to purchase directly through their factory dealers, a REMANUFACTURED (as opposed to rebuilt which can be done at a local shop and not alter the serial number) engine. This issue speaks specifically to a Series 60 Detroit Diesel Engine, series of engines made between approximately 1987 and 2011 was various variations.

According to Detroit Diesel (see attached document) these engines come with serial numbers, new build dates, and emissions labels certifying them compliant for their newly remanufactured date. Roadside, a remanufactured Detroit Diesel engine can easily be determined by looking at the engine serial number which will be in a format similar to (06RE*****, vs 06*****), where the "RE" indicates Remanufactured.

Detroit Diesel indicates all previous information to determine what year block or other parts were used to remanufacture the engine are removed, scrapped, or otherwise obliterated and is not available through the dealership or the factory.

For example, when an enforcement official is following guidance in 2017-05-ELDs he or she would simply open the hood of the truck, look at the new emissions label, see a date of 2017, and make the determination the driver is ELD required. The carrier and driver though, may insist the engine is pre-2000 and although it is often not the case, they may provide documentation showing a pre-2000 Detroit Diesel Serial number and build date. Often times these documents are false and never were associated with any parts of the engine, however whether false or legitimate, there is no way to positively confirm the information as the previous serial number on the block is obliterated and a new one is provided by Detroit Diesel along with a new build date.

I have spoken with Detroit Diesel who provided the attached letter on the topic. I have spoken with FMCSA top enforcement officials who initially were adamant the engine should be treated by the date provided by the manufacture on the engine labels; however, they later spoke with NHTSA who said the original build date of the

engine should be what is utilized. The problem with NHTSA's take on the issue is there is no way to positively determine the original date of these engines and because they were made well past 1999, an engine with a rebuild date of 2017 could contain a majority of parts from a 1995 engine, or it could contain all parts from a 2010 engine.

JUSTIFICATION OR NEED

For uniformity, and consistency across the country it is important we look at this issue and provide further training guidance similar to 2017-05-ELDs that instructs on how we should be enforcing the ELD mandate in these limited situations.

Currently we have enforcement officials who in some states will take the driver's word that their engine is pre-2000 without so much as opening the hood. In other states we have officials who are following the CVSA guidance of opening the hood, taking the date off the emissions control label, applying the ELD mandate, and placing driver's out of service for no ELD and then having their inspection Data Q'd.

An official stance or guidance on this matter would greatly increase consistency across the board so everyone with a stake in the issue knows what the outcome will be ahead of time.

REQUEST FOR ACTION

I request we provide guidance stating specifically: "engines manufactured prior to 2000 are exempt from the ELD mandate. Engines remanufactured after the year 1999 are NOT exempt from the ELD mandate." (See the last sentence in CVSA training bulletin 2017-05-ELDs)

This language will provide for the most uniform and easily understandable guidance for an official, driver, or motor carrier. Simply look at the date on your engine, or call a local Detroit Diesel dealer or the factory, provide them with the current serial number and the build date provided will determine whether it is ELD required or not.

SUPPORTING DOCUMENTS/PHOTOS

- [IMG_9817001.jpg](#)
- [Inspection-Bulletin-2017-05-ELDs.pdf](#)
- [Detroit-Diesel-Engines.pdf](#)

ACTION TAKEN BY COMMITTEE

Committee discussion and differing opinion. Need more information from engine manufacturers. How are we supposed to enforce remanufactured diesel engines.

Dates shows 2017, but driver states it is 1999. Pre 2000 don't have ECM. Motor has ECM but runs slow for ELD. Detroit says the motor is 2017 and meets the standards. Very few pieces left to original motor. Everything says go by the year of remanufacture. ELD and engine year are tough to enforce. A motion was made to change bulletin language to "engines manufactured prior to 2000 are exempt from the ELD mandate. Engines manufactured after the year 1999 are NOT exempt from the ELD mandate. Motion was withdrawn. Issue was tabled until the next meeting so we can get more information on remanufactured motors. Engine manufacturers on rebuilt engines are in question and roadside is unable to determine rebuilt status.

The ADHOC reached out to multiple remanufacturers to include Fisher Power Supply, Jasper Engines, Detroit Diesel, and Cummings. It was discovered that it is standard industry practice that remanufactured means remanufactured to original year specification. A rebuilt engine also maintains original year specification. The committee agreed that the original engine model year would be used when determining the ELD applicability. Additional language to CVSA Inspection Bulletin 2017-05 was drafted. It was suggested to add the additional language to page 9 of the inspection bulletin under "verifying engine model year" section. Suggested language for an addition to Operational Policy 15 was presented with no further discussion needed. FMCSA cautioned against giving specific guidance on remanufactured engines due to possible ELD rule changes. Suggested language is shown below:

For an addition to Operational Policy 15 and an amendment to CVSA Inspection Bulletin 2017-05 to indicate remanufactured and/or rebuilt engines be considered original engine model year equipment and read as follows:

Inspection Bulletin 2017-05

Engine Model Year - The engine model year is also on the emission control label. If the emission control label is missing or illegible, consider contacting the engine dealer or the manufacturer; you will need to provide the engine

serial number to obtain the model year. Typically, the engine model is one year older than the chassis model year. For example, a 2007 vehicle typically has a 2006 model year engine installed. Rebuilt engines keep their original identity and engine serial number.

Pre-2000 engines remanufactured and/or rebuilt after 2000 will retain the original engine model year for the purposes of the ELD exemption.

Operational Policy 15

How is engine model year determined when inspecting remanufactured and/or rebuilt engines?

Answer: Pre-2000 engines remanufactured and/or rebuilt after 2000 will retain the original engine model year for the purposes of the ELD exemption.