



EPA & ACE

Filing of Vehicle and Engines & Helpful Tips

Presenters:

Mario Jorquera, P.E., Senior Engineer, EPA Vehicle and Engine Enforcement Branch

Roy Chaudet, EPA, ACE Technical Lead

Sandra Langford-Coty, Director of Operational Development, A.N. Deringer, Inc.

Vehicles and Engines (V&E)

- The Clean Air Act prohibits import of any motor vehicle, motor vehicle engine, non-road engine, or equipment that does not conform to EPA emission standards and requirements into the U.S.

- Light-duty motor vehicles
- Motorcycles
- Heavy-duty on-highway engines
- Non-road engines
- Marine engines
- Recreational vehicles (dirt bikes, ATVs, ORUVs, and snowmobiles)

These standards apply to new or used vehicles and engines, manufactured either domestically or abroad. The standard applies to commercial/recreational/personal imports

Determining Filing Requirements for V&E

- [EPA Form 3520-1](#) Import passenger vehicles, highway motorcycles, and the corresponding engines into the United States
- [EPA Form 3520-21](#) Import heavy-duty highway engines and non-road engines (gas, diesel, marine, stationary) into the United States. Also applies for engines already installed in vehicles or equipment
- Contact the V&E Hotline at (734) 214-4100 or by email: Imports@epa.gov
- Importing Vehicles and Engines
<https://www.epa.gov/importing-vehicles-and-engines/publications-and-forms-importing-vehicles-and-engines>
- Small Equipment & Tools
<https://www.epa.gov/regulations-emissions-vehicles-and-engines/regulations-emissions-small-equipment-tools>

Goods not Regulated by EPA V&E

- If goods are not Regulated by EPA V&E, you can disclaim using the **Disclaim code A= Product is not regulated by this Agency**
- Tip: Ensure “Commercial Description” is sufficient to substantiate to EPA why you are disclaiming
- Examples of Disclaim code “A”

Original Equipment Manufacturers (OEMs)

- **Original Equipment Manufacturers (OEMs)** who are importing on-road and/or non-road vehicles and engines with certificates of conformity, are not required to file V&E declarations
- OEM's file with the disclaim reason code "**B – Data Not Required per Agency Guidance.**"
- Who qualifies as an OEM?
- OEM Guidance can be found at:
 - <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100QQ3X.pdf>

Filing V&E Without Full Message Set

If you cannot file electronically using the ACE PGA Message Set

- **Disclaim Code “C”** = data filed through other agency means. Uploading to the Document Image System (**DIS**)
Upload completed EPA forms 3520-1 (on-road) / 3520-21 (non-road) and other required document via DIS
- **Disclaim Code “D”** = data filed through paper. EPA Forms accompany the shipment and are presented to CBP

ACE Cargo Release Message – V&E

- **EPA Tariff Flag:** EP3 - Vehicle and Engines specific data may be required – Used as a guide only
- **Messages:**
 - “**Reject**” (AX/SX) File couldn’t be processed – “Bucket 1” reject
 - An EPA “**Under Review**” (SO70) –Some EPA Data is missing or invalid
 - An EPA “**May Proceed**” (SO70) –you have met filing requirements
- **File *early (well in advance of arrival at the port of entry) to allow for corrections if needed***
- PGA Correction can be filed up to 10 days from arrival
- After 10 days?
- While the shipment may have been released by CBP, the “Under Review” status means the goods have not been shown to meet EPA requirements



DIS

- Use EPA Agency document type in order for EPA and CBP to see documents

Document Name	Document Label (XML)	DocCode – DIS email
Importation of Motor Vehicles and Engines (on road)	EPA_3520_1_IMPORTER_OF_MOTOR_V_E_ON_ROAD	EPA01
Importation of Motor Vehicles and Engines (off road)	EPA_3520_21_IMPORT_OF_MOTOR_V_E_OFF_ROAD	EPA02
Pre-approved Vehicle/Engine Exemption Letter	EPA_V_E_EXEMPTION	EPA05

- When to upload documents via DIS for V&E?
 - Disclaimer “C” – Filing through other agency means
 - DIS is also helpful to supply additional material, including label photo, commercial docs, etc. if EPA filing status is “Under Review”

PG Record	V&E Message Set
OI	The commercial description of the shipment is provided
PG01	The PGA line number, Government Agency Code, and Government Agency Program Code are provided. Conditionally, the Disclaimer Code is provided
PG02	Product Identifier
PG24	Import & Industry Codes and Remarks
PG07	Model, Manufacture Date, and Item Identity Numbers
PG08	Report additional item identity numbers
PG10	Characteristics of the Product or Component
PG14	Licenses, Permits, Certificates, or Exemptions issued by EPA
PG19	Entity Role, Entity Identification, Entity Name, and Entity Address 1
PG20	Entity Address line 2, Apartment/Suite, City, State, and Zip/Postal Cod.
PG21	Individual Name, Telephone Number, and Email address
PG55	Identifies Entity from the previous PG19, PG20, and PG21 group as having additional roles
PG22	Importers Substantiating Documents, Document Identifiers, Conformance Declarations, and Declaration Certifications

Tips for Filing V&E

- Common filing error is not providing the correct Test Group Name/Engine Family Name in the PG14
- Take these steps before you transmit
- Obtain a picture of the Emission Control Information Label, it contains the Test Group/Engine Family Name, that is the key information to show a vehicle or engine has been certified and can be imported
- For information on finding the label, please see :
<http://www.epa.gov/importing-vehicles-and-engines/locating-vehicle-emissions-label>
- Tip: “Google” the Test Group/Engine Family Name prior to filing the entry data to ensure the number is accurate.



where is 2012 john deere engine label location



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4 results (0.30 seconds)

[PDF] 2017 CUMMINS ENGINE CO., INC. UBH A-021-0666-1 - California Air ...

https://www.arb.ca.gov/msprog/.../cummins_ubh_a0210666r1_6d7_0d20-0d01.pdf

... Certificate of Conformity for the above listed engine family. EPA CERTIFICATE OF CONFORMITY. PRIMARY INTENDED SERVICE CLASS. HCEXH0408BAV- ...

[PDF] 2017 BAE SYSTEMS PLATFORM SOLUTIONS UBH A-422-0005

https://www.arb.ca.gov/msprog/onroad/.../bae_ubh_a4220005_6d7_0d20-0d01.pdf

INTENDED. SERVICE. CLASS. ENGINE OBD PRIMARY ENGINE'S. COMPLIANCE IDLE EMISSIONS. CUMMINS INC. 2017. HCEXH0408BAV A-021-0666-1.

[PDF] Executive Order: 2017 ALLISON TRANSMISSION, INC. UBH A-419 ...

https://www.arb.ca.gov/.../allisontransmission_ubh_a4190007_6d7_0d20-0d01.pdf

... for the above listed engine family. EPA CERTIFICATE OF CONFORMITY. PRIMARY INTENDED SERVICE CLASS. / HCEXH0408BAV-017. VOCATIONAL. In.

[XLS] 2017 Model Year on Highway Engine Certification Data - EPA

<https://www.epa.gov/sites/production/files/2017-01/hdh-cert-ghg-2017.xls>

588, Cummins Inc. 2017, HCEXH0408BAV, HCEXH0408BAV-017, 42717, Diesel, 7-15 ppm ultra low sulfur diesel, Direct Injection, 42908, Turbocharged ...

In order to show you the most relevant results, we have omitted some entries very similar to the 4 already displayed

Tips for Filing V&E

- Make sure Test Group Name/Engine Family Name is correctly formatted. Include periods or dashes
- Ever wonder if it is a O or a zero or is it an 8 or a B? Positions 6 through 9 in Engine Family Name denote displacements, so they are always numbers or punctuations

A manufacturer should apply for new certificates and pay the appropriate certification fees for each family name that it intends to produce for sale in the United States.

A family name is a 12 character code that identifies all parts of that particular engine.

The typical naming convention is shown below, although some sectors have a slight variation.



Note:

* For dual or variable displacement families, enter the maximum displacement. If the displacement is given in liters, the decimal point count as a digit. In all cases, the displacement will be read in liters if a decimal point is included and it will be read in cubic inches or cubic centimeters if there is no decimal point.

Tips for Filing V&E

- Helpful link for Engine Family Names

<https://www.epa.gov/compliance-and-fuel-economy-data/annuali-certification-data-engines-and-equipment>



Heavy-Duty Evaporative Components	+
Heavy-Duty Highway Gasoline and Diesel Engines	+
Heavy-Duty Vehicles	+
Large Nonroad Spark-Ignition (NRSI) Engines	+
Light-Duty Vehicles and Trucks	+
Locomotive Engines, Idle Control Systems, and Non-OEM Components	+
Marine Compression-Ignition (CI) Engines	+
Marine Spark-Ignition (SI) Engines	+
Motorcycles, All Terrain, Utility, and Recreational Vehicles	+
Nonroad Compression Ignition (NRCI) Engines	+
Nonroad Evaporative Components	+
Portable Fuel Containers	+
Small Nonroad Spark-Ignition (NRSI) Engines	+
Snowmobiles	+

EPA Import Declarations Form 3520-1

Import passenger vehicles, highway motorcycles, and
the corresponding engines

EPA-V&E Data Map from Existing V&E Form 3520-1:

Form Approved OMB 2060-0717 Approval Expires July 31, 2020

 United States Environmental Protection Agency Declaration Form Importation of Motor Vehicles and Motor Vehicle Engines Subject to Federal Air Pollution Regulations U.S. EPA, Compliance Division, 2000 Traverwood Drive, Ann Arbor, MI 48106 www.epa.gov/otaq/imports Phone (734) 214-4100 Fax (734) 214-4010			
This form must be submitted to the U.S. Customs and Border Protection (Customs) (42 USC 7522, 7601; 19 CFR 12.73) for each motor vehicle (including motorcycles, disassembled vehicles, kit cars, light-duty vehicle/motorcycle engines) imported into the U.S., except that this form is not required for motor vehicles that are imported by their original manufacturer and are new and are covered by an EPA certificate of conformity and bear an EPA emission control label. One form per shipment may be used, with attachments including all information required to fully describe each vehicle or engine as below. Check the box below indicating the provisions under which you are importing this vehicle or engine. Offroad vehicles/engines and heavy-duty engines must use form 3520-21. Note: Although only imports using codes G, I, K, L, M-3, and O require specific written authorization from EPA, Customs may request EPA review of importer documentation and eligibility for any import using this form. A nonconforming vehicle that is ineligible for the exemptions or exclusions listed below, must be imported through an independent commercial importer (ICI) under codes A, C, J, or Z. For codes A, C, J, and Z, EPA does not authorize the release to the vehicle owner.			
Penalties: Any person who knowingly makes any false or fraudulent statement, or omits or conceals a material fact can be fined up to \$320,000 or imprisoned for up to 5 years, or both (18 USC 1001). Any person who improperly imports a motor vehicle (including a motorcycle) or engine may be fined up to \$44,538 per vehicle or engine (42 USC 7524), and may be subject to forfeiture of the entire importation bond, if applicable (40 CFR 85.1513), and the U.S. Customs Service may seize the vehicle or engine (19 CFR 162.21).			
Description and Declaration of Motor Vehicle or Motor Vehicle Engine (Note: Heavy-duty Engines must use form 3520-21)			
1. Port code: 2147	2. Entry date: (mm/dd/yyyy) 04/21/2017	3. Customs entry number: DFG-4567890-1	4. Vehicle Identification Number (VIN), engine serial number, or Engine Family/Test Group Name: ZHWUU16M4CLAU5577
5. Manufacture date (mm/yyyy): 05/2016	6. Manufacture (make): Lamborghini	7. Model: LP700-4	
8. ICI imports only, codes A, C, J, Z:		9. EPA Exemption Number, required for codes L, G, I, K, O: 2016-JUNE-LD-NORES-450	
Names, Addresses, and Telephone Numbers of Relevant Parties Certification: I certify that I have read and understand the purpose of this form, the penalties for falsely declaring information, or for providing misleading information, or for concealing a material fact. The information I have provided is correct, and all required attachments are appended to this form. I authorize EPA Enforcement Officers to conduct inspections or testing permitted by the Clean Air Act. I am the owner, importer, or agent for the owner or importer.			
10. Importer (code B; must be certificate holder or their agent for shipments of new vehicles prior to introduction into commerce; codes A, C, J, Z; must be ICI): Angelo Giovanni 1234 Mapleleaf Avenue San Diego, CA 92169 US	11. Owner: Angelo Giovanni 1234 Mapleleaf Avenue San Diego, CA 92169 US	12. Storage contact: Angelo Giovanni (555) 123-0123 ANGELO.GIOVANNI@TEST.COM	13. Signature:  14. Date: 04/21/2017 15. Name, company and phone (type or print): Angelo Giovanni (555) 123-0123 PG22

Port Code, Entry Date, and Entry number: These three data elements are captured by CBP Entry Data and will not be reported in the PGA Message Set.

Vehicle Identification Number (VIN): VINs are captured in the PG07 and PG08 records, and are identified by the code "AKG."

Manufacture Date: Date the vehicle was manufactured is located in the PG07 record.

Passenger Vehicle Data Elements

- **Import Code** – Provision for import (PG24)
- **Vehicle Identification Number (VIN):** (PG07/08)

VIN # location is on the vehicle
left hand side of the windshield.

10th digit of the VIN is the Model Year

VIN#: ZHWUU16M4**C**LAU5577

A	1980	L	1990	Y	2000	A	2010
B	1981	M	1991	1	2001	B	2011
C	1982	N	1992	2	2002	C	2012
D	1983	P	1993	3	2003	D	2013
E	1984	R	1994	4	2004	E	2014
F	1985	S	1995	5	2005	F	2015
G	1986	T	1996	6	2006	G	2016
H	1987	V	1997	7	2007	H	2017
J	1988	W	1998	8	2008	J	2018
K	1989	X	1999	9	2009	K	2019

- **Model Number** - Commercial Model Number of the vehicle (PG07)
- **Manufacture Date:** Date the vehicle was manufactured (MMYYYY) (PG07)
- **Manufacturer:** Name only is required (PG19) plus additional Entities
- **Test Group Name** 12 Characters (PG14)
- **EPA Letter of Approval:** Each letter has an Exemption Number (PG14)
- **EPA Bond Policy Number** (PG14)
- **Model Year** – Import Code “A” “C” “U” “Y” or “Z” (PG10)
- **Engine Power Rating** - Import Code “U” (PG10)

U.S. conforming and “identical” vehicles

code B - U.S. certified - unmodified vehicle bearing a U.S. EPA emission control label in engine compartment (or on motorcycle frame) in English.

code F - U.S. certified, catalyst restoration - U.S. certified vehicle as described above, except that the catalyst, oxygen sensors or fuel filler neck restrictor were removed or damaged. The importer attests that the catalyst and oxygen sensors and fuel filler neck restrictor, as applicable, will be re-installed or replaced after importation. If leaded gasoline was used, the importer attests that after importation (1) the fuel tank will be drained and refilled with unleaded gasoline, (2) the catalyst and oxygen sensors, if they were left on the vehicle during use of the leaded gasoline, will be replaced, and (3) the fuel filler neck restrictor will be checked and replaced as necessary. No bond or EPA approval is required.

EPA exempted vehicles

code M - miscellaneous exemption, either 1) **Canadian** vehicle as described above (proof required) and the importer is either permanently emigrating to the U.S. or will reside in the U.S. for greater than one year under a worker or student visa, or 2) Canadian vehicle received by U.S. resident through inheritance, or 3) EPA hardship letter based on unforeseen and extraordinary circumstances is attached to this form.

code E - vehicle at least 21 years old (calendar year of manufacture subtracted from year of importation) and in original unmodified configuration is either exempted or excluded from EPA emission requirements, depending on age. Vehicles at least 21 years old with replacement engines are not eligible for this exemption unless they contain equivalent or newer EPA certified engines. Customs may require proof of vehicle age.

Excluded vehicles

code L - racing vehicle as determined by EPA and may not be registered or licensed for use on or operated on public roads or highways (40 CFR 85.1511(e)). **EPA letter of approval must be attached to this form.**

code U -2005 model year (or older) motorcycle, scooter or moped with engine displacement less than 50cc and with rated speed greater than 5000 rpm.

code W - non-chassis-mounted engine to be used in a light-duty vehicle or light-duty truck or motorcycle which is currently covered by an EPA certificate or will be covered by an EPA certificate prior to introduction into commerce.

code Y - unregulated fuel - a vehicle that: (1) for model years earlier than 1991 operates on fuel other than gasoline or diesel fuel, or (2) for 1991-1996 model years operates on fuel other than gasoline or diesel or methanol fuel, or (3) for 1997 and later model years operates on fuel other than gasoline or diesel or methanol or ethanol or compressed natural gas (CNG) or liquid petroleum gas (LPG), including propane. This exemption does not apply to 2004 and later model year vehicles.

Temporary imports

code G - imported for **repair or alteration** in accordance with 40 CFR 85.1511(b)(1). May not be registered or licensed for use on, or operated on public roads or highways, or sold or leased in the U.S. **Customs bond required.** EPA requests that the vehicle be bonded for at least its full value. EPA letter of approval must be attached to this form.

code I - imported for **testing** purposes in accordance with 40 CFR 85.1511(b)(2). May not be registered or licensed for use on or operated on public roads or highways (except operation that is integral to the purpose of the testing program) or sold or leased in the U.S. **Customs bond required.** EPA requests that the vehicle be bonded for at least its full value. EPA letter of approval must be attached to this form.

code K - imported for **display** (solely for public or business purposes, and not for private purposes or U.S. market sales promotions) in accordance with 40 CFR 85.1511(b)(4). May not be registered or licensed for use on or operated on public roads or highways (except operation that is integral to the purpose of the display) or sold or leased in the U.S. **Customs bond required.** EPA requests that the vehicle be bonded for at least its full value. EPA letter of approval must be attached to this form.

code N - imported by member of the armed forces or personnel of a foreign government on assignment to the U.S., for whom free entry has been authorized in writing by the U.S. Department of State, or a member of the armed forces of a foreign country with official orders for duty in the U.S.

code O - imported by nonresident for personal use by an individual for a period up to a year. EPA letter of approval must be attached to this form.

Import Codes & Reporting Requirements

3520-1

Code	Description
B	U.S.-certified
F	U.S.-certified catalyst restoration
G	Imported for repair or alteration
I	Imported for testing purposes
K	Imported for display
J	Imported by an ICI for the purpose of pre-certification testing to obtain an EPA certificate of conformity
L	Racing vehicle
O	Imported by non-resident for personal use by and individual for a period up to a year

- When does EPA require bonding for EPA Form 3520-1?
- Exemptions and Exclusions are found on the EPA Form 3520-1

LPCO -PG14

Code	Description	Required by Import Code:
EP4	Test Group Name/Number (From the Certificate of conformity this is the Exhaust Engine Family name (EFN) and not the Evaporative Engine Family name.) Test Group/Engine Family Name must be limited to 12 characters, including 'periods'.	B, F
EP7	EPA Bond Policy Number	G, I, K, J
EP9	EPA Vehicles and Engines Exemption Number	G, I, K, L, O

Import Code selection may require additional data elements to be filed. Refer to "Appendix A" for a list of required data elements by Import Code

Import Code	Vehicles and Engines Required Data Element	Applicable PGA Record
B	Test Group Name/ Engine Family Number	PG14
F	Test Group Name/ Engine Family Number	PG14
EE	Certification of not importing for lease or resale	PG24
FF	Certification that labeling, warranty and CAFÉ requirements will be met	PG24
M	Explanation of exemption <ul style="list-style-type: none"> • Canadian vehicle received by US resident • Importer is either permanently emigrating to the US or will reside for greater than one year with a student or work visa 	PG24
L	Exemption Number	PG14
U	Model year and Power rating	PG10

Tips for Light-duty Motor Vehicles

- For light-duty motor vehicle (car, light-duty pickups, motorcycles) non-chassis-mounted used engine the importation would not be regulated. Can disclaim using Disclaim Code “A” – Not Regulated by this Agency
- For further clarification on Import Code requirements, please refer to EPA Imports Hotline, Compliance Division, Office of Transportation and Air Quality at (703) 214-4100 or imports@epa.gov
- Review the EPA Form 3520-1
- Refer to EPA Supplemental Guidelines
- Appendix “A” list of required data elements by Import Code

Entity Roles for EPA Form 3520-1

<i>Data Element</i>	<i>Code</i>	<i>Description</i>
Entity Role Codes	IM	Importer
	DFP	Owner
	MF	Manufacturer
	STL	Storage Location (Contact)
	CI	Certifying Individual

For EPA Form 3520-1, a minimum of four (4) entities must be identified: Importer, Manufacturer, Owner, and Certifying Individual

Importer – Name / Address & Point of Contact

Owner - Name / Address & Point of Contact

Certifying Individual - Name / Address & Point of Contact

Manufacturer –Name Only - No address required

Storage Location – Location of Goods for examination after import – Only a point of contact and their contact information is required

Names, Addresses, and Telephone Numbers of Relevant Parties

Certification: I certify that I have read and understand the purpose of this form, the penalties for falsely declaring information, or for providing misleading information, or for concealing a material fact. The information I have provided is correct, and all required attachments are appended to this form. I authorize EPA Enforcement Officers to conduct inspections or testing permitted by the Clean Air Act. I am the owner, importer, or agent for the owner or importer.

EPA Import Declarations Form 3520-21

Heavy-duty highway engines and non-road engines
(gas, diesel, marine, stationary)

EPA-V&E Data Map from Existing V&E Form 3520-21:

Form Approved OMB 2060-0717 Approval Expires July 31, 2020



United States Environmental Protection Agency Engine Declaration Form Importation of Engines, Vehicles, and Equipment Subject to Federal Air Pollution Regulations

U.S. EPA, Compliance Division, 2000 Traverwood Dr., Ann Arbor, Michigan 48105. (734) 214-4100; imports@epa.gov; www.epa.gov/otaq/imports/

This form must be submitted to the U.S. Customs and Border Protection (Customs) by the importer for each imported stationary, nonroad or heavy-duty highway engine, including engines incorporated into vehicles or equipment, but not for new products covered by an EPA certificate of conformity, bearing an EPA emission control label, if the original manufacturer is the importer. Note that references in this form to engines generally include vehicles or equipment if they are subject to equipment-based standards. One form per engine or group of engines in a shipment may be used, with attachments including all information required to fully describe each engine as below. This form must be retained for five years from the date of entry (19 CFR 103.4). Additional requirements may apply in California. NOTE: While certain imports require specific written authorization from EPA, CBP may request EPA review of importer documentation and eligibility for any import using this form. For light-duty motor vehicles, highway motorcycles, and the corresponding engines, use form 3520-1. This form does not apply to aircraft engines.

Identify the type of highway, nonroad, or stationary engine, vehicle, or equipment you are importing from the following list of products:

- A. Heavy-duty highway engines (for use in motor vehicles with gross vehicle weight rating above 8500 pounds). See 40 CFR parts 85, 86, and 1036.
- B. Locomotives or locomotive engines. See 40 CFR parts 1033 and 1068.
- C. Marine compression-ignition engines. See 40 CFR parts 1042 and 1068. This includes propulsion engines and auxiliary engines installed on marine vessels.
- D. Other nonroad compression-ignition engines. See 40 CFR parts 1039 and 1068.
- E. Marine spark-ignition engines. See 40 CFR parts 1045 and 1068.
- F. Recreational engines and vehicles, including snowmobiles, off-highway motorcycles, all-terrain vehicles, and offroad utility vehicles that are subject to the same emission standards as all-terrain vehicles. See 40 CFR parts 1051 and 1068.
- G. Other nonroad spark-ignition engines at or below 19 kW (or at or below 30 kW if total displacement is at or below 1000 cc). See 40 CFR parts 1054 and 1068.
- H. Other nonroad spark-ignition engines above 19 kW. See 40 CFR parts 1048 and 1068.
- I. Stationary compression-ignition engines. See 40 CFR part 60, subpart III.
- J. Stationary spark-ignition engines. See 40 CFR part 60, subpart JJJJ.

Check one of the following Codes to indicate the provision under which you are importing the engine, vehicle, or equipment:

- 1. U.S. certified engine or engine installed in a certified vehicle, covered by a valid EPA certificate of conformity and bearing an EPA emission control label in English. Additional information for Category G engines from 2010 and later model years (see 40 CFR 90.1007 or 1054.690):

Exempt from bond? if not exempt, IATAIC # for bond issuer: _____, policy number: _____, state of issue: _____

Permanent Exemptions for Nonconforming Engines

- 2. National security. Importing a labeled (where applicable) engine subject to 40 CFR 1068.315(a). For certain types of tactical equipment, this exemption may require prior EPA approval.
- 3. Manufacturer-owned engine. Importing a labeled engine by an engine manufacturer holding a current U.S. EPA certificate of conformity, subject to 40 CFR 1068.315(b).
- 4. Replacement engine. Importing a labeled engine by an engine manufacturer holding a current U.S. EPA certificate of conformity subject to 40 CFR 1068.315(c). This exemption does not apply to locomotive engines.
- 5. Extraordinary circumstances/hardship. Importing a labeled engine subject to 40 CFR 1068.315(d). An EPA letter of approval must be attached.
- 6. Hardship for small-volume manufacturers. Importing a labeled engine subject to 40 CFR 1068.315(e). An EPA letter of approval must be attached to this form.
- 7. Equipment-manufacturer hardship. Importing a labeled engine subject to 40 CFR 1068.315(f). This may also apply to secondary engine manufacturers. An EPA letter of approval must be attached to this form.
- 8. Identical configuration. Importing an engine subject to 40 CFR 1068.315(h). Such an engine must be identical in all material respects to a U.S.-certified version, and the importer must have owned it for at least six months before importation. An EPA letter of approval must be attached to this form. This exemption does not apply to locomotives.
- 9. Ancient engine. Importing an engine first manufactured at least 21 years earlier that is still in its original configuration, subject to 40 CFR 1068.315(i). This exemption does not apply to locomotives.

Industry Code:

Identifies the type of highway, non-road or stationary engine/vehicle; located in a PG24 record; identified as an Industry Code by the code "EP3."

Import Code:

Code identifying the provision under which you are importing the commodity; located in a PG24 record; identified as an Import Code by the code "EP2."

Bond Exemption:

Code identifying if the commodity is exempt

3520-21 – Heavy Duty Highway and Non-Road Engines

- **Import Code** – Provision for import (PG24)
- **Industry Code:** Identifies the type of highway, non-road or stationary engine/vehicle (PG24)
- **Model** (PG07)
- **Manufacture Date:** Date the vehicle was manufactured (MMYYYY) (PG07)
- **Engine Family Name** Engine Family Name must be limited to 12 characters, including 'periods' (PG14)
- **Manufacturer :** The name of the Manufacturer only (PG19), plus additional required entities
- **Build Date/Location:** location of the build date (manufacture date) is located in. Engine, Vehicle or Other (PG10)

3520-21 – Heavy Duty Highway and Non-Road Engines

- **Engine Serial Number – Code (“ENN”) (PG07/PG08)**
- **Vehicle’s Serial Number – Code (“SE”)**
- **Vehicle Identification Number - Code (“VIN”)**

- **Engine power rating (kW or HP) (PG10)**
- **Model year of the vehicle or engine (PG10)**

- **When does EPA Require bonding for EPA Form 3520-21?**
 - **Bond Exemption (PG24)**
 - **NAIC #/State: NAIC #/State (PG19)**
 - **Bond Policy # (PG14)**



United States Environmental Protection Agency Engine Declaration Form

Importation of Engines, Vehicles, and Equipment Subject to Federal Air Pollution Regulations

U.S. EPA, Compliance Division, 2000 Traverwood Dr., Ann Arbor, Michigan 48105. (734) 214-4100; imports@epa.gov; www.epa.gov/otaq/imports/

This form must be submitted to the U.S. Customs and Border Protection (Customs) by the importer for each imported stationary, nonroad or heavy-duty highway engine, including engines incorporated into vehicles or equipment, but not for new products covered by an EPA certificate of conformity, bearing an EPA emission control label, if the original manufacturer is the importer. Note that references in this form to engines generally include vehicles or equipment if they are subject to equipment-based standards. One form per engine or group of engines in a shipment may be used, with attachments including all information required to fully describe each engine as below. This form must be retained for five years from the date of entry (19 CFR 163.4). Additional requirements may apply in California. NOTE: While certain imports require specific written authorization from EPA, CBP may request EPA review of importer documentation and eligibility for any import using this form. For light-duty motor vehicles, highway motorcycles, and the corresponding engines, use form 3520-1. This form does not apply to aircraft engines.

Identify the type of highway, nonroad, or stationary engine, vehicle, or equipment you are importing from the following list of products:

- A. Heavy-duty highway engines (for use in motor vehicles with gross vehicle weight rating above 8500 pounds). See 40 CFR parts 85, 86, and 1036.
- B. Locomotives or locomotive engines. See 40 CFR parts 1033 and 1068.
- C. Marine compression-ignition engines. See 40 CFR parts 1042 and 1068. This includes propulsion engines and auxiliary engines installed on marine vessels.
- D. Other nonroad compression-ignition engines. See 40 CFR parts 1039 and 1068.
- E. Marine spark-ignition engines. See 40 CFR parts 1045 and 1068.
- F. Recreational engines and vehicles, including snowmobiles, off-highway motorcycles, all-terrain vehicles, and offroad utility vehicles that are subject to the same emission standards as all-terrain vehicles. See 40 CFR parts 1051 and 1068.
- G. Other nonroad spark-ignition engines at or below 19 kW (or at or below 30 kW if total displacement is at or below 1000 cc). See 40 CFR parts 1054 and 1068.
- H. Other nonroad spark-ignition engines above 19 kW. See 40 CFR parts 1048 and 1068.
- I. Stationary compression-ignition engines. See 40 CFR part 60, subpart IIII.
- J. Stationary spark-ignition engines. See 40 CFR part 60, subpart JJJJ.

Check one of the following Codes to indicate the provision under which you are importing the engine, vehicle, or equipment:

- 1. U.S. certified engine or engine installed in a certified vehicle, covered by a valid EPA certificate of conformity and bearing an EPA emission control label in English. Additional information for Category G engines from 2010 and later model years (see 40 CFR 90.1007 or 1054.690): Exempt from bond? If not exempt, NAIC # for bond issuer: _____, policy number: _____, state of issue: _____

Import Codes and Industry Codes & Reporting Requirements 3520-21

Import	Industry	Description
1		U.S.-certified engine or engine installed in a certified vehicle
10		Repairs or alterations
11		Testing
12		Display
18		Competition engine
	G	Other non-road spark-ignition engines at or below 19kW or below 30kW if total displacement is at or below 1000cc

Appendix “A” list of required data elements by Import Code & Industry Code for EPA Form 3520-21)

Code	Description	Required by Import Code:
EP4	Test Group Name/ Number (From the Certificate of conformity this is the Exhaust Engine Family name (EFN) and not the Evaporative Engine Family name.) Test Group/Engine Family Name must be limited to 12 characters, including ‘periods’.	1, 22 LPCO -PG14
EP7	Bond Policy Number	24c, and conditionally required for 1 + Industry G, and 22
EP9	EPA Vehicles and Engines Exemption Number	2, 10, 11, 12, 18

Import Codes (EPA Form 3520-21)

Import Code	Vehicles and Engines Required Data Element	Applicable PGA Record
1	Test Group Name/ Engine Family Number	PG14
	<i>When combined with Industry Code G:</i>	
	Model year	PG10
	Bond exemption status	PG24
	NAIC # for Bond issuer	PG19
	Bond Policy number	PG14
2	Exemption number (EPA Letter of Approval)	PG14
9	Model year	PG10
10	Exemption Number (EPA Letter of Approval)	PG14
11	Exemption number (EPA Letter of Approval)	PG14
12	Exemption number (EPA Letter of Approval)	PG14
16	Test Group Name/ Engine Family Number	PG14
17	Model year	PG10
18	Exemption number	PG14
19	Power rating and Model year	PG10
20	N/A	N/A
21	Explanation of exemption	PG24

Import Codes & Industry Codes - for 3520-21

- For further clarification on Import Code/Industry Codes requirements, please refer to EPA Imports Hotline, Compliance Division, Office of Transportation and Air Quality at (703) 214-4100 or imports@epa.gov
- Review the EPA Form 3520-21
- Refer to EPA Supplemental Guidelines
- Appendix “A” list of required data elements by Import Code

Entity Roles for EPA Form 3520-21

<i>Code</i>	<i>Description</i>
IM	Importer
DFP	Owner
STL	Storage Location (Contact)
MF	Manufacturer
CI	Certifying Individual

For EPA Form 3520-21, a minimum of four (4) entities must be identified: Importer, Manufacturer, Owner, and Certifying Individual

Importer – Name and Address (PG19&20) and Point of Contact (PG21)

Owner Name and Address (PG19&20) and Point of Contact (PG21)

Certifying Individual - Name and Address (PG19&20) and Point of Contact (PG21)

Manufacturer –Name Only - No address required

Storage Location – **Location of Goods for Examination after import** - Only a point of contact and their contact information is required

Names, Addresses, and Telephone Numbers of Relevant Parties

Certification: I certify that I have read and understand the purpose of this form, the penalties for falsely declaring information, for providing misleading information, or for concealing a material fact. The information I have provided is correct, and all required attachments are appended to this form. I authorize EPA Enforcement Officers to conduct inspections or testing permitted by the Clean Air Act. I am the owner, the importer, or an agent of the owner or importer.

Resources

EPA Supplemental Guide:

The PGA Message Set chapter/implementation guide and its related Appendix PGA can be found on CBP.gov at:

<https://www.cbp.gov/document/forms/epa-supplemental-catair-guidelines>

PGA Message Set Mapping

The correspondence between the electronic formats in ACE and the “paper” versions of EPA declarations forms is well explained in two CBP websites.

For the 3520-1 form (used for highway vehicles and engines other than heavy duty truck engines), see:

<https://www.cbp.gov/document/guides/epa-form-35201-pga-message-set-cross-walk>

For the 3520-21 form (used for heavy duty highway and all nonroad equipment or engines), see:

<https://www.cbp.gov/document/guides/pga-message-setepa-form-352021-cross-walk>

Resources

- EPA Filing Tips can be found at:

<https://www.cbp.gov/trade/ace/features>

Trade

Basic Import and Export

ACE and Automated Systems

Getting Started with Automated Systems

> Technical Documentation

ACE Features

ACE Federal Register Notices

> Programs and Administration

> Priority Trade Issues

> Rulings and Legal Decisions

> Stakeholder Engagement

> Trade Facilitation and Trade

Automated Commercial Environment (ACE) Features

ACE has modernized and streamlined trade processing across all business capabilities, including Manifest, Cargo Release, Post Release, Exports, and Government Agencies (PGAs).

Manifest	Cargo Release	Post Release	Exports	Document Image System (DIS)	PGA Integration	ACE Portal
Technical		References		Support		
<ul style="list-style-type: none">• ACE Customs and Trade Automated Interface Requirements (CATAIR)• PGA Message Set Implementation Guides• ACE/ITDS PGA Message Set Process Flows• ACE Cargo Release with PGA Data Glossary		<ul style="list-style-type: none">• ACE PGA Filing Status & POCs• ACE PGA Forms List for Imports• ACE PGA Forms List for Exports• ACE PGA Corrections List• Importance of the Single Window• PGA Filing Support:<ul style="list-style-type: none">• EPA - Pesticides• EPA - TSCA• EPA - Vehicles & Engines• EPA - ODS		<ul style="list-style-type: none">• PGA Integration FAQs		

What is a PGA pilot

Resources

- **ACE PGA Forms List – Imports**

<https://www.cbp.gov/document/guidance/ace-november-1-pga-forms>

- **Filing status and points of contact for Partner Government Agencies (PGA) in ACE**

<https://www.cbp.gov/document/guidance/ace-pga-filing-status#>

- **DIS Implementation Guide**

<https://www.cbp.gov/document/forms/dis-implementation-guide>

- **Agency Tariff Code to Agency Program Cross Reference**

<https://www.cbp.gov/document/guidance/agency-tariff-code-agency-program-cross-reference>

Questions?

Roy Chaudet (1st EPA Contact)

Office of Information Management
Office of Environmental Information
U.S. Environmental Protection Agency
Phone: (202) 566-1703
email: Chaudet.Roy@EPA.GOV

Mario Jorquera, P.E., Senior Engineer

Vehicle and Engine Enforcement Branch
Air Enforcement Division
U.S. Environmental Protection Agency
Phone: (202) 564-1079
email: jorquera.mario@epa.gov

Sandra Langford-Coty, LCB, CCS

Director of Operational Development
A.N. Deringer, Inc.
Phone: (310) 885-9777
email: slcoty@anderinger.com