Automotive Imports Fact Sheet
# Automotive Imports Fact Sheet

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**Attachments:**

- Manufacturers U.S. Representatives List
- Application For EPA Prior Written Approval
- Current List Of Independent Commercial Importers

* U.S. Environmental Protection Agency emission requirements only
Revised 11/2/92
AUTOMOTIVE IMPORTS FACT SHEET

(U.S. Environmental Protection Agency Requirements Only)

DISCLAIMER:

This fact sheet is produced by the U.S. Environmental Protection Agency (EPA) and is updated periodically. It is the responsibility of the importer to refer to the most recent version of the fact sheet when importing motor vehicles. Updates to the fact sheet may be obtained from the EPA free of charge. See Attachment 2 of the fact sheet for ordering address and phone number.
IMPORTERS BEWARE!

1) The EPA policy which permitted a first-time individual importer to import one nonconforming vehicle at least five model years old without the need to meet Federal emission standards \textbf{WAS ELIMINATED AS OF DECEMBER 31, 1990}.

2) \textbf{EPA STRONGLY RECOMMENDS THAT YOU BUY A VEHICLE THAT IS LABELED BY THE MANUFACTURER AS MEETING U.S. EMISSION STANDARDS}, because of the expense and potential difficulties involved with importing a vehicle not originally built to meet U.S. emission requirements.

3) \textbf{FOR U.S. VERSION VEHICLES DRIVEN OVERSEAS}, a bond may be required to be posted upon entry into the U.S. For U.S. version vehicles driven in Europe, the bond may be avoided if the vehicle participates in, and is shipped by, one of the EPA approved catalyst control programs. See Section D for details.

4) \textbf{U.S. VERSION VEHICLES THAT HAVE BEEN MODIFIED OR ALTERED ARE CONSIDERED TO BE NONCONFORMING VEHICLES. THEY ARE NO LONGER U.S. VERSION VEHICLES. (i.e., modifications, alterations, or substitutions of the engine, emission control system, transmission, transaxial, differential fuel system or any other feature that defines the exact vehicle configurations that are certified by the manufacture.)}

5) \textbf{NOT ALL NONCONFORMING MOTOR VEHICLES ARE ELIGIBLE FOR IMPORTATION UNDER THE IMPORT REGULATIONS}. Authorized independent commercial importers (ICIs) are allowed to import only certain vehicles based on what certificates of conformity they have obtained. In addition, an ICI may choose not to import a vehicle that it is eligible to import. For example, no ICI has chosen to import any motorcycle and ICIs seldom choose to import diesel-fueled vehicles.

6) Before buying or shipping a nonconforming motor vehicle, EPA strongly recommends that final arrangements be made with an ICI, or that written EPA prior approval or exemption be obtained, otherwise, costly storage fees may be assessed at the port of entry and/or the vehicle may not be eligible for importation.

Revised 11/2/92
IMPORTING NONCONFORMING VEHICLES

I. INTRODUCTION

On September 25, 1987, the U.S. Environmental Protection Agency (EPA) adopted new rules for importing motor vehicles and motor vehicle engines that, at the time of entry into the United States, do not conform with Federal emission requirements. Vehicles being imported into the United States that do not comply with U.S. emission standards are generally European luxury automobiles. Because these vehicles were originally built for sale in Europe (and elsewhere), they generally are not designed to meet emission requirements in the United States. These rules are effective for all vehicles imported after June 30, 1988.

II. BACKGROUND

The regulations governing EPA's program for the importation of vehicles that do not comply with U.S. emission requirements were originally provided for in 1972 pursuant to the Clean Air Act (Act). Section 203 of the Act prohibits the importation of any new motor vehicle or engine (hereafter referred to as "vehicle") not covered by a certificate of conformity unless it is exempted by EPA or otherwise authorized jointly by EPA and the U.S. Customs Service (Customs) regulations. With respect to imported vehicles, Section 216 of the Act defines an imported vehicle as a "new" motor vehicle. Therefore, every vehicle imported into the United States is considered a "new" motor vehicle under the Imports regulations. Such regulations are appropriate to ensure that imported vehicles are brought into conformity with applicable emission standards. The authority to allow importation of such "nonconforming vehicles" is discretionary with EPA and Customs. Customs will not permit admission of your vehicle until both emission (EPA) and safety (Department of Transportation) requirements are met.

III. IMPORTATION REQUIREMENTS

The Act requires that new or used vehicles (cars, trucks, motorcycles, or heavy-duty engines) imported into the U.S. comply with Federal emission requirements. (Certain vehicles are not subject to Federal emission requirements due to date of manufacture; refer to section VII. A. for a list of these vehicles).
There are basically two vehicle categories which are subject to import restrictions:

A. **Vehicles manufactured in conformity with U.S. emission requirements and originally equipped with a catalytic converter and/or oxygen sensor and operated outside the U.S., Canada, Mexico, Japan, Australia, Taiwan and Bahama Islands.**

Vehicles in this category will contain U.S. emissions compliance labels that will identify them as such in the English language and may be imported by individuals. For more information on vehicles falling within this category and their importation requirements, please refer to Section D of this fact sheet.

B. **Vehicles which were not manufactured in conformity with U.S. emission requirements.**

These vehicles will not be labeled as complying with U.S. emission requirements. The rules do not prohibit an individual, such as one who might vacation in Europe and return with a nonconforming European built vehicle, from importing a vehicle into the U.S. Instead, the rules require individuals to arrange for such importations through an independent commercial importer (ICI) holding a valid EPA "certificate of conformity".

---

1/ **HOW TO FIND THE U.S. EMISSIONS COMPLIANCE LABEL**

1) 1971 and later conforming vehicles will have a label in the engine compartment entitled "Vehicle Emission Control Information" which will contain the name and trademark of the manufacturer and an unconditional statement of compliance with EPA emission regulations. For MOTORCYCLES, this label will be on the frame,

2) 1968 through 1970 conforming motor vehicles will have a label on the doorpost indicating compliance with Federal motor vehicle safety standards, and

3) 1967 and earlier motor vehicles are excluded from meeting U.S. emission requirements and will not have a compliance label.

2/ "Independent commercial importer or ICI" means a commercial importer who is not an original equipment manufacturer (like Mercedes-Benz) and who does not have a contractual agreement with an original equipment manufacturer to act as its authorized representative for the distribution of vehicles or engines into the U.S. market.

3/ A "certificate of conformity" is a document issued by EPA to a manufacturer or ICI to certify a particular class of vehicles (like Mercedes-Benz 500, 5.0 liter engine having a specific emissions configuration) which has been tested and shown to be capable of meeting U.S. emission requirements. Other vehicles in the manufacturer's or ICI's production line are built or modified to be identical to the prototype vehicle as described in the manufacturer's or ICI's application for certification.
ICI certificate holders bear the responsibility not only for performing all necessary modifications and testing, but also for assuring compliance of the vehicles they import with EPA emission requirements for 5 years/50,000 miles. In effect, this imposes on certificate holders the same emission requirements imposed on original equipment manufacturers (OEM) by the Act. Further, these vehicles must be held by the ICI for at least 15 Federal working days after the modifications and testing to allow EPA the opportunity to inspect the vehicles. These vehicles would be part of the certificate holder's "production line" and the certificate holder would be responsible for complying with all requirements for the vehicles they modify, whether or not they are actually owned by the certificate holder. A certificate holder must explicitly agree and comply with these responsibilities before EPA will approve the final admission of the vehicle into the U.S. (See also Section VI: Certificate Holder Compliance Requirements)

IV. VEHICLES THAT MUST BE IMPORTED BY A CERTIFICATE HOLDER

WARNING: Not all vehicles are eligible to be imported. Eligibility varies from year to year and may vary with the certificate holder. You need to determine whether your vehicle is eligible to be imported by a certificate holder and make arrangements just prior to purchasing and shipping your vehicle! You may contact one of the certificate holders listed on Attachment 3 to determine if that certificate holder is qualified and willing to import your vehicle.

A. Vehicles less than six years old

Imported nonconforming vehicles less than six years old must be modified so as to be covered by a certificate of conformity. Whether a vehicle may be imported depends on several factors (including the year in which the vehicle will be imported and whether the certificate holder has a certificate for a vehicle like yours). An ICI certificate holder wishing to import these vehicles must either: 1) obtain an EPA certificate of conformity for the model/model year (for example, Mercedes-Benz 500 originally manufactured in 1990) it desires to import, or 2) obtain EPA prior written approval to use the vehicles as prototypes to obtain the certificate of conformity. After modification of the vehicle, every third vehicle must be tested to measure its emissions.

4/ For the purposes of EPA regulations, a vehicle's age is determined by subtracting the calendar year in which it was originally manufactured from the calendar year of importation. For example, a vehicle built by a European manufacturer in 1986 and imported into the U.S. in 1988 would be two years old.
B. **Vehicles six years old or older**

Any vehicle six years old or older may be imported by any ICI holding a valid certificate of conformity if the ICI certificate holder is willing to be responsible for modifying and testing the vehicle and complying with the other emission requirements. Vehicles imported by a certificate holder under this option are subject to a "modification/test" procedure rather than the certification procedure outlined above. EPA permits entry of these older vehicles under the "modification/test" procedure in part to provide a greater degree of models available to consumers.

C. **Vehicles twenty-one years old or older**

Any vehicle twenty-one years old or older may be imported by any ICI holding a valid certificate of conformity. Modifications and testing are not required. Vehicle age is calculated by subtracting the year of manufacture from the year of importation.

V. **PHASE-IN PERIOD**

EPA provided for a five year phase-in period for the certification program beginning in 1988, which expired December 31, 1992.
VI. CERTIFICATE HOLDER COMPLIANCE REQUIREMENTS

A certificate holder who imports your nonconforming vehicle is responsible for:

1) Performing all modifications and emission testing, if required, within 120 days after the vehicle enters the United States.

2) Reporting the results of the modification and testing (if required) to EPA and holding the vehicle for 15 working days beginning with the date that EPA receives this report (or longer if EPA so notifies the certificate holder). During this period and the period preceding this report, the vehicle cannot be sold, offered for sale, returned to the owner, or driven on public roads or highways.

3) Bearing responsibility for the vehicle's compliance with emission standards over the vehicle's useful life. This includes pre-release inspections and subsequent recall requirements.

4) Ensuring that the vehicle contains an emission label and vacuum hose diagram, as well as providing you with prepaid emission warranties and maintenance instructions for the vehicle.

5) Performing fuel economy tests and providing you with gas guzzler tax forms.

VII. EXEMPTIONS AND EXCLUSIONS

A. Exclusions based on age of vehicles or engines

The following vehicles are excluded from the emission requirements of the Act and may be imported without a bond by any individual or business (although the importer must file with U.S. Customs, upon entry, an EPA Form 3520-1, declaring entry category "R" through "V" as applicable):

6/ The useful life of an imported nonconforming vehicle or engine begins when the certificate holder sells the vehicle or delivers it to its owner. For cars, the useful life is five years or 50,000 miles, which ever occurs first.

7/ Vehicles or motorcycles which satisfy any of the criteria in 1-4 may no longer satisfy the criteria if they have been upgraded with newer engines.
1) Gasoline-fueled light-duty vehicles and light-duty trucks originally manufactured prior to January 1, 1968. (EPA Form 3520-1 declaration category "R")

2) Diesel-fueled light-duty vehicles originally manufactured prior to January 1, 1975. (EPA Form 3520-1 declaration category "S")

3) Diesel-fueled light-duty trucks originally manufactured prior to January 1, 1976. (EPA Form 3520-1 declaration category "T")

4) Motorcycles originally manufactured prior to January 1, 1978. (EPA Form 3520-1 declaration category "U")

5) Gasoline-fueled and diesel-fueled heavy-duty engines originally manufactured prior to January 1, 1970. (EPA Form 3520-1 declaration category "V")

6) Methanol-fueled vehicles and engines originally manufactured prior to January 1, 1991. (EPA Form 3520-1 declaration category "Y")

B. "Identical to Certified U.S. Version" Exemption

PROVE PRIOR TO IMPORTATION THAT THE VEHICLE IS IDENTICAL, IN ALL MATERIAL RESPECTS, TO A VEHICLE IDENTIFIED IN AN ORIGINAL EQUIPMENT MANUFACTURER'S (OEM's) CERTIFICATION APPLICATION.

This exemption is available for use of the vehicles in the U.S. by the current owners. This exemption is not allowed for the purpose of resale of the vehicles in the U.S.

Two options are available:

1) The owner must obtain a letter from the OEM's U.S. representative (for a list see Attachment 1) attesting to the compliance of the vehicle. The letter must contain an unconditional statement that the vehicle (make, model, model year, VIN), at the time of manufacture, conformed to all U.S. emission requirements applicable to the appropriate model year. You must then obtain prior written approval from EPA before you attempt to import. To obtain prior written approval from EPA, you must provide:

a) A completed application for prior written approval (Attachment 2). These importations will be covered under the "Hardship Exemption" (code letter M) as described on the application form.

b) The original letter described above from the U.S. representative of the manufacturer on company letterhead.

NOTE: Regardless of the requirements above being satisfied, a vehicle is not eligible for this exemption if it has been modified or altered such that the vehicle configuration is not covered under the manufacturer's certificate of conformity.
2) MODIFY THE VEHICLE (PRIOR TO IMPORTATION) TO MAKE IT IDENTICAL, IN ALL MATERIAL RESPECTS, TO A VEHICLE IDENTIFIED IN AN OEM'S CERTIFICATION APPLICATION. The owner must obtain a letter from the OEM's U.S. representative (for a list see Attachment 1) outlining the necessary modifications to make the vehicle identical to it's U.S. certified counterpart. The letter must list specific parts (including part numbers) which must be installed or replaced to bring the vehicle into conformity. The individual must then have the vehicle modified in accordance with those modification instructions. After the modifications are completed, the individual may then obtain prior written approval from EPA before attempting to import. To obtain prior written approval from EPA, the individual must provide:

a) A completed application for prior written approval (Attachment 2). These importations will be covered under the "Hardship Exemption" (code letter M) as described on the application form.

b) The original letter described above from the U.S. representative of the manufacturer on company letterhead.

c) A clear copy of the paid invoice documenting that the proper parts (including part numbers) were installed or replaced and any necessary adjustments were made.

NOTES:
1) Regardless of the requirements above being satisfied, a vehicle is not eligible for this exemption if it has been modified or altered such that the vehicle configuration is not covered under the manufacturer's certificate of conformity.

2) Generally, EPA only accepts compliance information from the OEM's U.S. representative. However, as an exception to this rule, statements of conformity will be acceptable to EPA as evidence of conformity from General Motors of Canada if they are signed by a representative of the Vehicle Emission Compliance Department. This policy of accepting letters from someone other than the U.S. representative of the vehicle manufacturer does not apply to other manufacturers at this time.

C. Racing Exclusion

YOU MUST RECEIVE EPA'S PRIOR WRITTEN APPROVAL FOR THIS TYPE OF IMPORTATION. NOT ALL RACING VEHICLES ARE EXCLUDED FROM EMISSIONS COMPLIANCE. Racing vehicles which are not capable of being operated on streets/highways AND which are to be used only for racing events are excluded from the emission requirements of the Act and may be imported by any individual or business. As noted on the attached Prior Approval Application form, the following information must be submitted to EPA: the name of the sanctioning body and competition class; a schedule of racing events, including dates and locations where the vehicle will participate; a copy of the competition racing license; a letter from the state's Department of Motor Vehicles that states that the vehicle cannot be licensed for use on public streets or highways, and explains why it cannot be licensed; and four photographs of the vehicle must be included, one each of front, rear and each side. Additional information may be required in some cases.
D. Other exemptions which are outlined on the attached Prior Approval Application form

Other exemptions and the documentation required by EPA are described on the Prior Approval Application form (Attachment 2). EPA's written approval should be obtained prior to shipping your vehicle from overseas.

VIII. OTHER REQUIREMENTS

A. Customs

General questions regarding the importation of your vehicle should be directed to the Customs port where your vehicle will be entered. However, for further assistance you may contact:

U.S. Customs Service
Office of Trade Operations
Other Agency Enforcement Branch
1301 Constitution Avenue, N.W.
Washington, DC 20229
(202) 927-0402

B. Safety

Customs will not admit your vehicle into the U.S. until both emission and safety requirements are met, as well as other applicable Federal requirements. The EPA rules do not impact or reflect the Federal safety requirements to which the vehicles must comply. For information on safety requirements contact:

U.S. Department of Transportation
400 7th Street, S.W.
Room 6115
Washington, D.C. 20590
(202) 366-5313

C. Gas Guzzler Tax

A "Gas Guzzler Tax" may need to be paid on your vehicle. These taxes range from $500 to $3,850 per vehicle. For more information, contact:

Internal Revenue Service
Public Affairs Office
1111 Constitution Avenue, N.W.
Washington, D.C. 20224
(202) 622-4920
D. California emission requirements

The State of California has its own program for regulating the importation of nonconforming vehicles that are sold, registered, or operated in California. If you are a resident of, principally drive your car in, register or intend to sell vehicles in the State of California, you will need to comply with California's emission requirements in addition to the Federal emission requirements. For more information on California's requirements, contact:

State of California
Air Resources Board
Mobile Source Control Division
9528 Telstar Avenue
El Monte, CA 91731
(818) 575-6858

E. Other State requirements

1. Proof of Federal Emissions Compliance

Many State Department of Motor Vehicles (DMVs) require documentation indicating that Federal emission requirements have been met and proof of ownership before registration and/or titling of the vehicle will be permitted. Since Federal law prohibits the sale or operation of a nonconforming motor vehicle until Federal emission requirements have been met, EPA supports these State efforts to ensure that Federal laws are not being violated. EPA has indicated to representatives of State DMVs that the following documentation would be necessary in order to show that a vehicle being imported under this new imports program meets Federal emission requirements:

A. a copy of the EPA entry form 3520-1, and

B. for vehicles entered by ICIs, a verification letter from EPA which states that all applicable emission requirements have been met. To obtain such a letter, call (202) 233-9660.

C. for vehicles that EPA granted prior approval, a copy of the EPA letter of Prior Approval.

2. Proof of Gas Guzzler Payment

Some states will require proof of payment of the gas guzzler tax, if applicable to your vehicle (for information on this tax, see Section VIII. C.).

3. Inspection/Maintenance Requirements

Your state may operate an Inspection/Maintenance (I/M) program which is designed to satisfy the state's requirement for reducing excess emissions caused by vehicles that are not properly tuned or are in need of repair. Because I/M programs are customized to the needs of each local area, you should contact your local I/M office for more information on its requirements. A state test is not the same as a Federal test, and EPA will not accept state test results to satisfy Federal requirements.
C-1

IMPORTING CANADIAN VEHICLES

On July 1, 1988, the U.S. Environmental Protection Agency (EPA) introduced new regulations which considerably revised the then existing regulatory program for the importation of nonconforming vehicles. This action affected models not manufactured for sale in the U.S., including nonconforming vehicles from Canada which are not labeled with an unconditional statement of conformity with U.S. emission requirements. If your vehicle does not contain such a label, then you must import your vehicle according to one of the options described below.

NOTE: These options relate only to compliance with EPA requirements; your vehicle may be subject to additional requirements of the U.S. Department of Transportation.

IMPORTATION BY AN INDIVIDUAL

Five options are available:

Option 1)

PROVE THAT THE VEHICLE IS IDENTICAL, IN ALL MATERIAL RESPECTS, TO A VEHICLE IDENTIFIED IN AN ORIGINAL EQUIPMENT MANUFACTURER'S (OEM's) CERTIFICATION APPLICATION (prior to importation). To do this, the individual must obtain a letter from the OEM's U.S. representative (for a list see Attachment 1) attesting to the compliance of the vehicle. The letter must contain an unconditional statement that the vehicle (make, model, model year, VIN), at the time of manufacture, conforms to all U.S. emission requirements applicable to the appropriate model year. You must then obtain prior written approval from EPA before you attempt to import. To obtain prior written approval from EPA, you must provide:

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1 HOW TO FIND THE U.S. EMISSIONS COMPLIANCE LABEL

1) 1971 and later conforming vehicles will have a label in the engine compartment entitled "Vehicle Emission Control Information" which will contain the name and trademark of the manufacturer and an unconditional statement of compliance with EPA emissions regulations. For MOTORCYCLES, this label will be on the frame,

2) 1968 through 1970 conforming motor vehicles will have a label on the doorpost indicating compliance with Federal motor vehicle safety standards, and

3) 1967 and earlier motor vehicles are excluded from meeting U.S. emission requirements and will not have a compliance label.
IMPORTATION BY AN INDIVIDUAL (cont.)

a) A completed application for prior written approval (Attachment 2). These importations will be covered under the "Hardship Exemption" (code letter M) as described on the application form.

b) The original letter described above from the U.S. representative of the manufacturer on company letterhead.

NOTE: Regardless of the requirements above being satisfied, a vehicle is not eligible for this exemption if it has been modified or altered such that the vehicle configuration is not covered under the manufacturer's certificate of conformity.

Option 2)

MODIFY THE VEHICLE (prior to importation) TO MAKE IT IDENTICAL, IN ALL MATERIAL RESPECTS, TO A VEHICLE IDENTIFIED IN AN OEM'S CERTIFICATION APPLICATION. The individual must obtain a letter from the OEM's U.S. representative (for a list see Attachment 1) outlining the necessary modifications to make the vehicle identical to its U.S. certified counterpart. The letter must list specific parts (including part numbers) which must be installed or replaced to bring the vehicle into conformity. The individual must then have the vehicle modified in accordance with those modification instructions. After the modifications are completed, the individual may then obtain prior written approval from EPA before attempting to import. To obtain prior written approval from EPA, the individual must provide:

a) A completed application for prior written approval (Attachment 2). These importations will be covered under the "Hardship Exemption" (code letter M) as described on the application form.

b) The original letter described above from the U.S. representative of the manufacturer on company letterhead.

c) A clear copy of the paid invoice documenting that the proper parts (including part numbers) were installed or replaced and any necessary adjustments were made.

NOTES:
1) Regardless of the requirements above being satisfied, a vehicle is not eligible for this exemption if it has been modified or altered such that the vehicle configuration is not covered under the manufacturer's certificate of conformity.

2) Generally, EPA only accepts compliance information from the OEM's U.S. representative. However, as an exception to this rule, statements of conformity will be acceptable to EPA as evidence of conformity from General Motors of Canada if they are signed by a representative of the Vehicle Emission Compliance Department.
IMPORTATION BY AN INDIVIDUAL (cont.)

This policy of accepting letters from someone other than the U.S. representative of the vehicle manufacturer does not apply to other manufacturers.

Option 3)

VEHICLE IS ON THE ATTACHED LIST. These vehicles have been proven to be identical in all material respects to a U.S. certified version of the same make, model and model year. You must obtain prior written approval from EPA before you attempt to import. To obtain prior written approval from EPA, you must provide:

a) A completed application for prior written approval (Attachment 2). These importations will be covered under the "Hardship Exemption" (code letter M) as described on the application form.

b) A description of the vehicle (make, model, model year, and VIN).

Option 4)

IMMIGRANTS FROM CANADA MAY NOT NEED EPA'S PRIOR APPROVAL TO IMPORT A VEHICLE. To qualify for this exemption the immigrant must demonstrate to the U.S. Customs Service at the border crossing the following:

a) The immigrant must have a document from the Immigration & Naturalization Service (INS) proving that he/she has been granted U.S. immigrant status.

b) One of the following: (i) vehicle must have in a door jamb a Transport Canada label with the CMVSS designation, (ii) the owner must present a letter from the manufacturer's U.S. representative (for a list see Attachment 1) which unconditionally states that for the applicable model year, the vehicle complied with all applicable Canadian emission requirements or all applicable U.S. EPA emission requirements, or (iii) a sales receipt showing that the vehicle was purchased from a Canadian dealership and was new at the time it was purchased.

c) The immigrant must have proof that he/she owned the vehicle prior to immigration. The vehicle's Canadian title or registration in the name of the importer is required.

d) The immigrant must write the word "Immigrant" at the top of the EPA entry Form 3520-1 and declare code M. Form 3520-1 may be obtained from the U.S. Customs Service at the border crossing.

e) Alternatively to waiting to get to the border crossing for approval, the immigrant may send the information required in a, b, and c above directly to EPA for a prior letter of approval.
IMPORTATION BY AN INDIVIDUAL (cont.)

Option 5)

ANY INDIVIDUAL CHANGING HIS/HER PERMANENT RESIDENCE FROM CANADA TO THE U.S. FOR AT LEAST THREE YEARS.

a) Importer must demonstrate he/she is changing permanent residence for at least three years. Acceptable documentation includes any of the following: a document from the Immigration & Naturalization Service (INS) proving that the importer has been granted immigrant status, a Visa valid for at least three years, a letter from the importer's employer verifying transfer to the U.S. for at least three years, acceptance to a three year or longer program at a college or university in the U.S., a written statement that self certifies the importer is permanently moving to the U.S., or other related documentation.

b) Proof that vehicle is a Canadian vehicle. Acceptable documentation includes a letter from the manufactures U.S. representative (for a list see attachment 1) which unconditionally states that for the applicable model year, the vehicle complied with all applicable Canadian emission requirements or all applicable U.S. EPA emission requirements, or (iii) a sales receipt showing that the vehicle was purchased from a Canadian dealership and was new at the time it was purchased.

c) The importer must have proof that he/she owned the vehicle prior to immigration. The vehicle's Canadian title or registration in the name of the importer is required.

d) You must then obtain prior written approval from EPA before you attempt to import.

IMPORTATION OF A "COMPANY" VEHICLE BY A BUSINESS

A business located in Canada may import a Canadian vehicle that has been owned by the business to a location in the U.S. for the purposes of continued use by the business, NOT FOR RESALE. The conditions of option 1, 2 or 3 of the previous section entitled IMPORTATION BY AN INDIVIDUAL must be met.
IMPORTATION BY A BUSINESS FOR THE PURPOSES OF RESALE

No business may import used Canadian cars for the purpose of resale. Only designated Canadian importers (DCIs) approved by EPA may import new Canadian vehicles for resale. To be included on EPA's list of approved DCIs, the company must agree in writing to the terms and conditions that apply to it as an importer of Canadian vehicles. In general terms, an importer of vehicles from Canada who wishes to be included on the list must agree to import only preapproved new models and provide labeling, warranties, recall obligations, and a three working day hold period. EPA will send a copy of the agreement to interested parties upon request. DCIs cannot import under any option available to individuals.

SPECIAL IMPORTATIONS

1) Conforming vehicles that have a label which attests to the compliance of the vehicle with U.S. emission requirements (either on the door jamb or underhood) may be imported by any individual or business and may pass freely across the border with respect to emissions requirements. EPA approval is not required.

2) In some cases, for Canadian vehicles that do not have a U.S. emissions label, Customs will allow temporary importations for a limited period of time. This generally applies to tourists and commercial vehicles. This is handled by Customs, not EPA!

Attachment
VEHICLES MADE FOR SALE IN CANADA
THAT MEET U.S. EMISSION REQUIREMENTS*

* These vehicles meet U.S. Federal emission requirements except possibly for labeling, warranty, and recall requirements. These vehicles may not all comply with applicable Federal safety standards or local emission requirements.
1993 Model Year Vehicles Made for Sale in Canada that Conform to U.S. Emission Requirements

I. 1993 General Motors Products

1.0 All 1993 model year light-duty vehicles conform to U.S. emission requirements.
   1.1 10th digit of VIN must be P (1993 model year)

1992 Model Year Vehicles Made for Sale in Canada that Conform to U.S. Emission Requirements

I. 1992 Mercedes-Benz Products

All 1992 model year Mercedes-Benz vehicles conform to U.S. emission requirements.

II. 1992 General Motors Products

1.0 All 1992 model year light-duty vehicles conform to U.S. emission requirements.
   1.1 10th digit of VIN must be N (1992 model year)

1991 Model Year Vehicles Made for Sale in Canada that Conform to U.S. Emission Requirements

I. 1991 Honda/Acura Products

1.0 All 1991 model year light-duty vehicles conform to U.S. emission requirements.
   1.1 10th digit of VIN must be M (1991 model year)

II. 1991 Ford Products

1.0 All 1991 model year light-duty vehicles conform to U.S. emission requirements.
   1.1 10th digit of VIN must be M (1991 model year)

III. 1991 General Motors Products

1.0 All 1991 model year light-duty vehicles conform to U.S. emission requirements.
   1.1 10th digit of VIN must be M (1991 model year)

IV. 1991 Mercedes-Benz Products

All 1991 model year Mercedes-Benz vehicles conform to U.S. emission requirements.
1990 Model Year Vehicles Made for Sale in Canada that Conform to U.S. Emission Requirements

I. 1990 Ford Products

1.0 All 1990 model year light-duty vehicles conform to U.S. emission requirements.
   1.1 10th digit of VIN must be L (1990 model year)

2.0 All 1990 model year light-duty trucks (under 8,501 lbs. GVW) conform to U.S. emission requirements.
   2.1 10th digit of VIN must be L (1990 model year)

II. 1990 General Motors Products

1.0 All light-duty vehicles conform to U.S. emission requirements.
   1.1 10th digit of VIN must be L (1990 model year)

2.0 All light-duty trucks (under 8,501 lbs GVW) except those with the 6.2 liter diesel engine conform to U.S. emission requirements.
   2.1 10th digit of VIN must be L (1990 model year)
   2.2 8th digit of VIN cannot be J (excludes 6.2 liter diesel engine)
   2.3 4th digit of the VIN must be B, C, D, E or F (GVW under 8,501 lbs)

III. 1990 Honda/Acura Products

1.0 All 1990 model year light-duty vehicles conform to U.S. emission requirements.
   1.1 10th digit of VIN must be L (1990 model year)
1990 Products (cont.)

IV. 1990 Mazda Products

1.0 All 1990 model year light-duty passenger cars conform to U.S. emission requirements.

1.1 10th digit of VIN must be L (1990 model year)

V. 1990 Mercedes-Benz Products

All 1990 model year Mercedes-Benz vehicles conform to U.S. emission requirements.
1989 Model Year Vehicles Made for Sale in Canada that Conform to U.S. Emission Requirements

I. 1989 BMW Products

1.0 All BMW 3 Series with the following VIN designation.
   - WBAAB030-K-------
   - WBAAB930-K-------
   - WBAAD030-K-------
   - WBAAD930-K-------
   - WBAAE030-K-------
   - WBAAE930-K-------
   - WBSAK030-K-------
   - WBSAK103-K-------

2.0 All BMW 5 Series with the following VIN designation.
   - WBAHC230-K-------
   - WBAHC130-K-------
   - WBAHD131-K-------
   - WBAHD231-K-------

3.0 All BMW 7 Series with the following VIN designation.
   - WBAGB431-K-------
   - WBAGB331-K-------
   - WBAGC431-K-------
   - WBAGC831-K-------

II. 1989 Ford Products

1.0 All 1989 model year light-duty vehicles conform to U.S. emission requirements.
   1.1 10th digit of VIN must be K (1989 model year)

2.0 All 1989 model year light-duty trucks (under 8,501 lbs. GVW) conform to U.S. emission requirements.
   2.1 10th digit of VIN must be K (1989 model year)

III. 1989 General Motors Products

1.0 All light-duty vehicles conform to U.S. emission requirements.
   1.1 10th digit of VIN must be K (1989 model year)
1989 General Motors Products (cont.)

2.0 All light-duty trucks (under 8,501 lbs GVW) except those with the 6.2 liter diesel engine conform to U.S. emission requirements.

2.1 10th digit of VIN must be K (1989 model year)
2.2 8th digit of VIN cannot be J (excludes 6.2 liter diesel engine)
2.3 4th digit of the VIN must be B, C, D, E or F (GVW under 8,501 lbs)

IV. 1989 Honda/Acura Products

1.0 All 1989 model year light-duty vehicles conform to U.S. emission requirements.

1.1 10th digit of VIN must be K (1989 model year)

V. 1989 Hyundai Products

1.0 All 1989 Sonatas with 2.4 liter engines conform to U.S. emission requirements.

1.1 8th digit of VIN must be K (1989 model year)
1.2 6th digit of VIN must be S (designates 2.4 liter gasoline engines)

VI. 1989 Jeep Products

1.0 All 1989 model year light-duty trucks conform to U.S. emission requirements.

1.1 10th digit of VIN must be K (1989 model year)

IV. 1989 Mazda Products

1.0 All 1989 model year light-duty passenger cars conform to U.S. emission requirements.

1.1 10th digit of VIN must be K (1989 model year)

V. 1989 Mercedes-Benz Products

All 1989 model year Mercedes-Benz vehicles conform to U.S. emission requirements.
1988 Model Year Vehicles Made for Sale in Canada that Conform to U.S. Emission Requirements

I. 1988 Ford Products

1.0 All 1988 model year light-duty vehicles conform to U.S. emission requirements except some Tracer and Tempo/Topaz models and those vehicles with the 351 cubic inch engine.
   1.1 For Tracer models the 6th and 7th VIN digits cannot be 10, 11, 12, 13, 15 or 16
   1.2 For Tempo/Topaz models the 6th and 7th VIN digits cannot be 30 or 35
   1.3 8th digit of VIN cannot be G (excludes 351 cubic inch engine)
   1.4 10th digit of VIN must be J (1988 model year)

2.0 All 1988 model year light-duty trucks (under 8,501 lbs. GVW) conform to U.S. emission requirements.
   2.1 10th digit of VIN must be J (1988 model year)
   2.2 4th digit of VIN cannot be H, J, K, L, M, N, P, R or S (excludes GVW over 8,500 lbs.)

II. 1988 General Motors Products

1.0 All light-duty vehicles built with the RPO designation NA5 conform to U.S. emission requirements.
   1.1 10th digit of VIN must be J (1988 model year)

2.0 All light-duty trucks (under 8,501 lbs. GVW) built with the RPO designation NA5 conform to U.S. emission requirements except those with the 6.2 liter diesel engine.
   2.1 10th digit of VIN must be J (1988 model year)
   2.2 8th digit of VIN cannot be J (excludes 6.2 liter diesel engine)
   2.3 4th digit of the VIN must be B, C, D, E or F (GVW under 8,501 lbs.)

3.0 On GM light-duty vehicles and light-duty trucks is a Service Parts Identification label that contains codes for certain parts and options originally installed on the vehicle along with the vehicle identification number.
1988 GM Products (cont.)

The labels are in one of four places.

3.1 Under the rear deck lid (trunk lid)
3.2 Under the rear load flow (trunk floor under carpeting)
3.3 In the glove compartment
3.4 In station wagons they may be on the back of the rear seat, on a wheel well under carpeting, or under the carpet on the floor.

Service Parts Identification

If the label contains the code NA5 it is a U.S. certified version vehicle. The only exception are 1988 model year trucks with the 6.2 liter diesel engine. These trucks do not meet U.S. emission requirements even if they have the NA5 code.

NOTE: The importer must provide EPA with a picture of the label clearly showing the NA5 designation. This picture should accompany any other documentation required for obtaining prior approval.

III. 1988 Honda/Acura Products

1.0 All 1988 model year light-duty vehicles conform to U.S. emission requirements.

1.1 10th digit of VIN must be J (1988 model year)
IV. **1988 Chrysler Products** (does not include Jeep Eagle vehicles)

1.0 All 1988 model year light-duty vehicles conform to U.S. emission requirements.

1.1 10th digit of VIN must be J (1988 model year)

2.0 All 1988 model year light-duty trucks (under 8,501 lbs. GVW) conform to U.S. emission requirements except those with the 360 cubic inch engine.

2.1 10th digit of VIN must be J (1988 model year)
2.2 8th digit of VIN cannot be 1, 5, 8, or W (excludes 360 cubic inch engine)
2.3 4th digit of VIN must be D, E, F, G, H or J (excludes GVW over 8,500 lbs.)

V. **1988 Jeeps**

1.0 All 1988 model year light-duty trucks with a label (applied by the original equipment manufacturer) on the door jamb that states that it meets U.S. EPA regulations applicable to 1988 model year new motor vehicles, conform to U.S. emission requirements.

1.1 10th digit of VIN must be J (1988 model year)

VI. **1988 Mazda Products**

1.0 All 1988 model year light-duty passenger cars conform to U.S. emission requirements.

1.1 10th digit of VIN must be J (1988 model year)

VII. **1988 Mercedes-Benz Products**

All 1988 model year Mercedes-Benz vehicles conform to U.S. emission requirements.
1987 Model Year Vehicles Made for Sale in
Canada that Conform to U.S. Emission Requirements

I. 1987 Volvo Products

1.0 All 1987 model year 240, 740, and 760 series vehicles
conform to U.S. emission requirements.

1.1 The tenth digit of the VIN will have an H to signify
the 1987 model year.
1.2 The fourth digit of the VIN will have an A, F or G
to signify the 240, 740 or 760 series respectively.

II. 1987 Ford Products

1.0 The following 1987 model year light-duty vehicles conform
to U.S. emission requirements.

1.1 The tenth digit of the VIN will have an H to signify
the 1987 model year.
1.2 Complying light-duty vehicles.

<table>
<thead>
<tr>
<th>Model</th>
<th>1987 Editions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Escort/Lynx/EXP</td>
<td>all</td>
</tr>
<tr>
<td>Tempo/Topaz</td>
<td>all except those with digits 18, 21, 71, or 74 in the 6th and 7th VIN positions. Except those with an R in the 8th VIN position.</td>
</tr>
<tr>
<td>Mustang</td>
<td>all</td>
</tr>
<tr>
<td>Taurus/Sable</td>
<td>only those with D in the 8th VIN position.</td>
</tr>
<tr>
<td>Merkur XR4TI</td>
<td>all</td>
</tr>
<tr>
<td>Thunderbird/Cougar</td>
<td>all</td>
</tr>
<tr>
<td>Crown Victoria/Grand Marquis</td>
<td>all except those with G in the 8th VIN position</td>
</tr>
<tr>
<td>Country Squire/Colonel Park</td>
<td>all except those with G in the 8th VIN position</td>
</tr>
<tr>
<td>Town Car</td>
<td>all</td>
</tr>
<tr>
<td>Continental/Mark VII</td>
<td>all</td>
</tr>
<tr>
<td>Mark VII LSC</td>
<td>all</td>
</tr>
</tbody>
</table>
1987 Ford Products (cont.)

1.3 Complying Light Trucks (under 8500 lbs. GVW)

Club Wagon all except those with H through Z in the 4th VIN position.
E Series Vans
F Series Pick-ups
Bronco
Aerostar all
Bronco II all
Ranger all except those with E in the 8th VIN position.

III. 1987 GM Products

1.0 All light-duty vehicles built with the RPO designation NA5 conform to U.S. emission requirements.

1.1 10th digit of VIN must be H (1987 model year)

2.0 All light-duty trucks (under 8,501 lbs. GVW) built with the RPO designation NA5 conform to U.S. emission requirements except those with the 6.2 liter diesel engine.

2.1 10th digit of VIN must be H (1987 model year)
2.2 8th digit of VIN cannot be C or J (excludes 6.2 liter diesel engine)

3.0 On GM light-duty vehicles and light-duty trucks is a Service Parts Identification label that contains codes for certain parts and options originally installed on the vehicle along with the vehicle identification number. The labels are in one of four places.

3.1 Under the rear deck lid (trunk lid)
3.2 Under the rear load flow (trunk floor under carpeting)
3.3 In the glove compartment
3.4 In station wagons they may be on the back of the rear seat, on a wheel well under carpeting, or under the carpet on the floor.

If the label contains the code NA5 it is a U.S. certified version vehicle. The only exception are 1987 model year trucks with the 6.2 liter diesel engine. These trucks do not meet U.S. emission requirements even if they have the NA5 code. See "1988 GM Products" on page 4 for more information about the NA5 code.

NOTE: You must provide EPA with a picture of the label clearly showing the NA5 designation. This picture should accompany any other documentation required for obtaining prior approval.

IV. 1987 Mercedes-Benz Products

All 1987 model year Mercedes-Benz vehicles conform to U.S. emission requirements.
I. 1986 Ford Products

1.0 The following 1986 model year light-duty vehicles conform to U.S. emission requirements.

1.1 The tenth digit of the VIN will have a G to signify the 1986 model year.

1.2 Models that meet U.S. emission requirements

Escort/Lynx/EXP all

Tempo/Topaz all except those with R in the 8th VIN position.

Mustang/Capri all except those with 3 in the 8th VIN position.

LTD/Marquis Thunderbird/Cougar

Continental/Mark VII all

Crown Victoria/Grand Marquis only those with M in 8th VIN position

Town Car all

2.0 The following 1986 model light-duty trucks conform to U.S. emission requirements.

1.1 The tenth digit of the VIN will have a G to signify the 1986 model year.

1.2 The 4th digit of the VIN must have an A, B, C, D, E, F, or G to indicate a GVWR less than 8500 lbs.

1.3 Models that meet U.S. emission requirements.

Ranger all

Bronco II all

Aerostar all

E-Series (Vans) all except those with Y in the 8th VIN position and use leaded fuel.

F-Series (Pick-ups)
III. 1986 GM Products

1.0 All vehicles built with the RPO designation NA5 conform to U.S. emission requirements.

1.1 10th digit of VIN must be G (1986 model year)

2.0 On GM light-duty vehicles and light-duty trucks is a Service Parts Identification label that contains codes for certain parts and options originally installed on the vehicle along with the vehicle identification number. The labels are in one of four places.

2.1 Under the rear deck lid (trunk lid)
2.2 Under the rear load flow (trunk floor under carpeting)
2.3 In the glove compartment
2.4 In station wagons they may be on the back of the rear seat, on a wheel well under carpeting, or under the carpet on the floor.

See "1988 GM Products" on page 4 for more information about the NA5 code.

NOTE: If the label contains the code NA5 it is a U.S. certified version vehicle. The importer must provide EPA with a picture of the label clearly showing the NA5 designation. This picture should accompany any other documentation required for obtaining prior approval.

IV. 1986 Mercedes-Benz Products

All 1986 model year Mercedes-Benz vehicles conform to U.S. emission requirements.
1985 Model Year Vehicles Made for Sale in Canada that Conform to U.S. Emission Requirements

I. 1985 Volvo Products

1.0 1985 Volvo 240 Series with the following VIN designation.

<table>
<thead>
<tr>
<th>Volvo 240</th>
<th>VIN Number</th>
<th>Volvo 240</th>
<th>VIN Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>240</td>
<td>YV1AX474XF1000000</td>
<td>240</td>
<td>YV1AX885XF1000000</td>
</tr>
<tr>
<td>240</td>
<td>YV1AX475XF1000000</td>
<td>240</td>
<td>YV1AX884XF2000000</td>
</tr>
<tr>
<td>240</td>
<td>YV1AX474XF2000000</td>
<td>240</td>
<td>YV1AX885XF2000000</td>
</tr>
<tr>
<td>240</td>
<td>YV1AX475XF2000000</td>
<td>240</td>
<td>YV1AX884XF3000000</td>
</tr>
<tr>
<td>240</td>
<td>YV1AX474XF3000000</td>
<td>240</td>
<td>YV1AX885XF3000000</td>
</tr>
<tr>
<td>240</td>
<td>YV1AX884XF1000000</td>
<td>240</td>
<td>YV1DX884XF1000000</td>
</tr>
<tr>
<td>240</td>
<td>YV1AX884XF2000000</td>
<td>240</td>
<td>YV1DX884XF2000000</td>
</tr>
</tbody>
</table>

2.0 1985 Volvo 740 Series with the following VIN designation.

<table>
<thead>
<tr>
<th>Volvo 740</th>
<th>VIN Number</th>
<th>Volvo 740</th>
<th>VIN Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>740</td>
<td>YV1AX884XF1000000</td>
<td>740</td>
<td>YV1AX885XF3000000</td>
</tr>
<tr>
<td>740</td>
<td>YV1AX885XF1000000</td>
<td>740</td>
<td>YV1DX884XF1000000</td>
</tr>
<tr>
<td>740</td>
<td>YV1AX884XF2000000</td>
<td>740</td>
<td>YV1DX884XF2000000</td>
</tr>
<tr>
<td>740</td>
<td>YV1AX885XF2000000</td>
<td>740</td>
<td>YV1DX874XF1000000</td>
</tr>
<tr>
<td>740</td>
<td>YV1AX884XF3000000</td>
<td>740</td>
<td>YV1DX874XF2000000</td>
</tr>
<tr>
<td>740</td>
<td>YV1DX694XF1000000</td>
<td>740</td>
<td>YV1DX764XF1000000</td>
</tr>
</tbody>
</table>

3.0 1985 Volvo 760 Series with the following VIN designation.

<table>
<thead>
<tr>
<th>Volvo 760</th>
<th>VIN Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>760</td>
<td>YV1DX694XF1000000</td>
</tr>
<tr>
<td>760</td>
<td>YV1DX874XF1000000</td>
</tr>
<tr>
<td>760</td>
<td>YV1DX874XF2000000</td>
</tr>
<tr>
<td>760</td>
<td>YV1DX764XF1000000</td>
</tr>
</tbody>
</table>

II. 1985 Mercedes-Benz Products

All 1985 model year Mercedes-Benz vehicles conform to U.S. emission requirements.
1984 and Earlier Model Year Vehicles Made for Sale in Canada that Conform to U.S. Emission Requirements

I. GM Products
   1.0 All 1968 through 1974 light-duty vehicles.
   2.0 All 1970 through 1978 trucks having a GVWR of more than 6000 pounds.
   3.0 All 1968 through 1984 Chevrolet Corvettes.

II. Ford Products
   1.0 All 1968 through 1974 light-duty vehicles.
   2.0 All 1970 through 1978 trucks having a GVWR of more than 6000 pounds.

III. Chrysler Products
   1.0 All 1968 through 1974 light-duty vehicles.
   2.0 All 1970 through 1978 trucks having a GVWR of more than 6000 pounds.

IV. AMC Products
   1.0 All 1968 through 1974 light-duty vehicles.
   2.0 All 1970 through 1978 trucks having a GVWR of more than 6000 pounds.

V. Mercedes-Benz Products
   1.0 All Mercedes-Benz vehicles manufactured from September 1, 1980 through December 31, 1984 conform to U.S. emission requirements.

VI. Other Manufacturers
   1.0 All 1968 through 1978 International Harvester passenger cars and trucks. 1979 Scout model, if equipped with a diesel engine.
   2.0 All Mack trucks manufactured from 1970 through 1979.
   3.0 All 1970 through 1979 Kenworth trucks, except 1979 trucks using the Detroit Diesel 12V71 model engine.
   4.0 All 1970 through 1979 White, White Western Star, and Autocar trucks.
   5.0 All Peterbuilt trucks manufactured from 1970 through 1979.
Other Manufacturers (cont.)

6.0 All 1970 through 1979 Caterpillar engines used in trucks having a GVWR of more than 6000 pounds.

7.0 All 1970 through 1979 Cummins engines used in trucks having a GVWR of more than 6000 pounds.

8.0 All 1970 through 1978 Detroit Diesel engines used in trucks having a GVWR of more than 6000 pounds.
U.S. VERSION VEHICLES DRIVEN OVERSEAS

The use of leaded fuel in a vehicle equipped with a catalytic converter will affect the ability of the catalyst to effectively reduce emissions. In many overseas countries unleaded fuel is not yet widely available. Because your vehicle's catalytic converter and oxygen sensor (if applicable) play an important part in reducing the emissions of your vehicle, EPA must ensure that their effectiveness has not been impaired by the use of leaded gasoline.

NOTE:

1) NOT ALL VEHICLES EQUIPPED WITH CATALYTIC CONVERTERS ARE CERTIFIED U.S. VERSION VEHICLES. For a vehicle to be eligible for importation under this section, it must have an EPA emissions label in the English language in the engine compartment, or it must be accompanied by a letter from EPA or the U.S. representative of the original equipment manufacturer that states the vehicle was either manufactured to be a U.S. certified version or identical in all material respects to a U.S. version. Otherwise, the vehicle must be imported as a nonconforming vehicle under section "B" Importing Nonconforming Vehicles.

2) ANY U.S. VERSION VEHICLE THAT HAS BEEN ALTERED SUCH THAT IT IS NO LONGER IN AN EPA CERTIFIED CONFIGURATION (other than removal of the catalyst and oxygen sensor) IS NOT ELIGIBLE TO BE IMPORTED AS A U.S. VERSION VEHICLE. SUCH VEHICLES MUST BE IMPORTED AS NONCONFORMING VEHICLES UNDER SECTION B.

3) ALL U.S. VERSION DIESEL-FUELED VEHICLES ARE NOT SUBJECT TO THE REQUIREMENTS IN THIS FACT SHEET AND MAY BE IMPORTED WITHOUT BOND FOR EPA PURPOSES. Importers must declare category "CC" on the EPA 3520-1 submitted to U.S. Customs upon entry.
4) ANY GASOLINE-FUELED U.S. VERSION VEHICLE THAT WAS NOT ORIGINALLY MANUFACTURED WITH A CATALYTIC CONVERTER IS NOT SUBJECT TO IMPORT RESTRICTIONS AND MAY BE IMPORTED WITHOUT BOND CONCERNING EPA REGULATIONS. However, the importer must obtain prior written approval by EPA and declare entry category "DD" on the EPA Form 3520-1 submitted to U.S. Customs upon entry.

5) THE RESULTS OF A STATE OR SERVICE STATION OR DEALERSHIP EMISSION TEST DO NOT PROVE THAT THE VEHICLE COMPLIES WITH FEDERAL EMISSION REQUIREMENTS since these tests were designed to detect automobiles with excessively high emissions for certain pollutants and does not measure other Federally regulated pollutants.

6) U.S. VERSION VEHICLES DRIVEN SOLELY WITHIN THE U.S., CANADA, MEXICO, JAPAN, AUSTRALIA, TAIWAN OR BAHAMA ISLANDS ARE NOT SUBJECT TO THE REQUIREMENTS OF THIS FACT SHEET. Submission of EPA Form 3520-1 to U.S. Customs is not required and an importation bond is not required for EPA purposes.

7) A U.S. VERSION VEHICLE THAT HAS ALL EMISSION CONTROL EQUIPMENT INSTALLED AND PROPERLY FUNCTIONING, AND THAT IS NEW (driven less than 50 miles) MAY BE IMPORTED WITHOUT EPA RESTRICTION. IMPORTERS MUST DECLARE CATEGORY "BB" ON THE EPA FORM 3520-1 SUBMITTED TO U.S. CUSTOMS UPON ENTRY

I. Protecting Your Converter

If you are contemplating exporting your U.S. version vehicle from North America, you may obtain authorization to have the catalytic converter and oxygen sensor (if your vehicle was manufactured with one) removed prior to shipment. When returning your vehicle to the U.S., the catalytic converter and the oxygen sensor will only have to be reinstalled, rather than replaced. For more information concerning such authorization, call EPA's Field Operations and Support Division at (202) 233-9060. (Note: information concerning all importation issues other than authorization to remove catalytic converters and oxygen sensors should be directed to EPA's Manufacturers Operations Divisions at (202) 233-9660)
II. **EPA's Policy**

Vehicles which were originally equipped with a catalytic converter or a catalytic converter and oxygen sensor, and were built to meet U.S. emission requirements (i.e., covered by a certificate of conformity and equipped with a U.S. emissions label) but have been driven outside the United States, Canada, Mexico, Japan, Australia, Taiwan and Bahama Islands may be imported by any individual. However, these vehicles are subject to import restrictions.

Generally, EPA's regulations require that the catalytic converter, or catalytic converter and oxygen sensor (certain 1978 and newer models are equipped with both a catalytic converter and oxygen sensor), be replaced on vehicles which may have been contaminated with leaded gasoline overseas.

Vehicles manufactured prior to the 1974 model year (i.e., 1973 model year vehicles and earlier) were not equipped with a catalytic converter. 1976 and later model year vehicles which were equipped with a catalytic converter may be identified by the word "Catalyst" found either on the underhood emissions label or on the door jamb adjacent to the DOT safety label. The vehicle's fuel filler inlet restrictor will also have to be replaced if it has been removed or disabled. This requirement is necessary because unleaded gasoline is still not widely available in all areas outside North America, and use of leaded fuel can damage these components.

III. **Demonstrating Compliance with Federal Requirements**

A. **Bonded Entries**

EPA requires an importation bond to assure that components which are vital to reducing emissions are fully operational after use overseas. The amount of the bond is determined by Customs and is generally the value of the vehicle. To enter a vehicle built to U.S. emission requirements into the U.S., you must file an EPA Form 3520-1 with Customs using category F. This form may be obtained from either your bonding company or Customs. After an entry has been made with Customs, you have **120 days to bring your vehicle into compliance with EPA requirements**. You must choose one of the following options, as applicable, in order to gain EPA release of your bond:

1) Replace the catalytic converter and oxygen sensor (if applicable) and verify the functional ability of the fuel filler inlet restrictor. Have the work performed by a qualified mechanic in the U.S. using new **original equipment** parts. Submit to EPA (address on page E-1) a clear copy of the paid invoice from the facility where the work was done along with a completed EPA form 3520-9 "Application for Final Admission of a Catalytic Converter and Oxygen Sensor Equipped Vehicle" (copy on page D-7). This form must be signed by both you and the mechanic who performed the work.
2) If you had your catalytic converter and oxygen sensor (if applicable) removed prior to going overseas, new parts replacement will not be necessary when the vehicle is returned to the U.S. However, the original parts must be reinstalled by a qualified mechanic according to the manufacturers instructions. The mechanic must also verify that your vehicle's fuel filler inlet restrictor is operational and has not been tampered with. Submit to EPA (address on page E-1) clear copies of the paid invoices showing that the parts were removed prior to export and reinstalled after returning to the U.S. along with a completed EPA Form 3520-9 "Application for Final Admission of a Catalytic Converter and Oxygen Sensor Equipped Vehicle" (copy on page D-7). This form must be signed by both you and the mechanic who performed the work.

3) If your vehicle was driven only on unleaded gasoline, you may verify this by having your vehicle tested for the presence of lead. THIS OPTION IS ONLY AVAILABLE FOR VEHICLES DRIVEN OVERSEAS IN THE FOLLOWING COUNTRIES: Portugal, Spain, France, Italy, Greece, Austria, Germany, Belgium, Netherlands, Luxembourg, Switzerland, Sweden, Norway, Denmark, Iceland, Finland, United Kingdom, Ireland, South Korea, Liechtenstein and Hong Kong.

Verification of unleaded gasoline usage must be made as follows:

a. The test must be performed by a certified mechanic in the United States according to the instructions provided with the attached "Plumbtesmo Test Report Form" (copy on page D-5).

b. You must complete your portion of the form and take the vehicle along with the enclosed packet of test paper (if not enclosed please call (202) 233-9660) to the mechanic for testing. CAUTION: CARE MUST BE TAKEN TO AVOID CONTAMINATION OF THE TEST PAPER. Keep the packet of test paper dry, out of direct sunlight and do not open until the test is to be performed.

c. Upon completion of the test, the mechanic must sign the form to verify that the test was performed according to EPA's instructions.

d. As the instructions indicate, if the test results are positive (indicating leaded fuel usage) or the inspection reveals that the fuel filler inlet restrictor was damaged or tampered with or missing, your catalytic converter and oxygen sensor (if applicable) must be replaced with original equipment parts. You must provide EPA with a completed EPA Form 3520-9 (copy on page D-7) along with a paid work invoice documenting that the parts were replaced.

Some catalytic converters contain removable pellets. In such a case, only the pellets need to be removed and reinstalled, and the outside casing may remain on the vehicle.
e. If the test results are negative, the test report form (with the Plumbtesmo paper strip attached) must be mailed to EPA for confirmation.

f. If EPA determines that the test results are satisfactory, EPA will release its obligation on the Customs importation bond. Component replacement will not be necessary for your vehicle.

B. Unbonded Entries

YOU MAY NOT NEED TO POST A BOND! The importation of U.S. version vehicles equipped with a catalytic converter or a catalytic converter and oxygen sensor from countries other than Canada, Mexico, Japan, Australia, Taiwan, and Bahama Islands will not be subject to bonding for EPA purposes in the following cases:

1) Vehicles participating in and meeting the requirements of the Department of State (DOS), Department of Defense (DOD), or Panama Canal Commission (PCC) programs approved by EPA. For more information regarding DOD's program you should contact the DOD POV Action Officer at (703) 614-4082; for the DOS program you should contact the General Services Officer at (202) 647-3658; and for the PCC program you should contact the Assistant to the Secretary for Commission Affairs at (202) 634-6441. An EPA Form 3520-1 with category "AA" declared and a certification statement from one of the above programs must be submitted to U.S. Customs upon entry of the vehicle into the U.S.

2) Any vehicle which is equipped with a catalytic converter or a catalytic converter and oxygen sensor and participates in one of the EPA approved Manufacturers or Shippers Catalyst Control Programs on page D-8. An EPA Form 3520-1 with category "AA" declared and a certification statement from one of the above programs must be submitted to U.S. Customs upon entry of the vehicle into the U.S.
Warning: Any person who knowingly makes any false or fraudulent statement or conceals a material fact shall be fined not more than $250,000 or imprisoned not more than 5 years or both. 18 United States Code 1001

1. Port of Entry  
2. Entry Date (mo/da/yr)  
3. Entry Number  
4. Vehicle Identification Number (VIN)  

5. Vehicle Manufacturer  
6. Vehicle Model  
7. Vehicle Model Year  

8. Vehicle Owner Name (Last, First, MI)  
9. Address (Street, City, State, ZIP and Telephone Number)  

10. Vehicle Storage Location (if different than owner's address) (No. P.O. Boxes)  

11. List of countries in which vehicle was driven:  

12. I certify under penalty of perjury that this vehicle was driven by me overseas on unleaded fuel exclusively and at no time was leaded fuel introduced into this vehicle. I understand that I could be subject to civil and/or criminal prosecution if I knowingly make a false or fraudulent statement or conceal a material fact. I certify that the information I have provided is correct.  

Signature of Owner  
Taxpayer ID# (SSN)  
Date  
Telephone Number  

13. I certify under penalty of perjury that I have conducted the EPA approved test for detection of leaded fuel usage in accordance with the attached instructions and have attached the test paper results above. All test procedures and guidelines were adhered to. Furthermore, I confirm that the fuel filter inlet restrictor, catalytic converter, and oxygen sensor, is intact and operational. I understand the warning regarding the submission of false or fraudulent statements or concealing material fact, and I certify that the information I have provided is correct.  

Signature, Business Name and Address of Licensed Mechanic  
Date  

Mailing instructions  
Mail this form to the following address  
when using certified U.S. Express Mail, or regular mail:  

Attn. FINAL ADMISSION  
U.S. Environmental Protection Agency  
Manufacturers Operations Division (6405J)  
401 M. St., S.W.  
Washington, DC 20460 (202) 233-9660  

For delivery by a courier service  
(e.g., Federal Express, DHL, etc....)  
Only use the following address:  

Attn. FINAL ADMISSION  
U.S. Environmental Protection Agency  
Manufacturers Operations Division (6405J)  
501 3rd St., N.W.  
Washington, DC 20001 (202) 233-9660  

Privacy Act Statement  
Collection of the information on this form is authorized by the Clean Air Act, 42 USC sec. 7401 et. seq. (see 40 CFR sec. 85.1501 et seq., Importation of Motor Vehicles and Motor Vehicle Engines). The Environmental Protection Agency (EPA) uses this information to determine compliance of imported motor vehicles and heavy-duty engines with U.S. emission requirements and for investigations with respect to EPA's import regulations. Disclosure of this information may be made to other Federal, State or local law enforcement agencies when there is a violation of civil or criminal law. Furnishing the information on this form is voluntary, but failure to do so may result in disapproval for entry into the U.S. of the motor vehicle or heavy-duty engine identified on this form.  

Paperwork Reduction Act Notice  
The public reporting burden for this collection of information is estimated to average 30 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), U.S. Environmental Protection Agency, 401 M Street, S.W. Washington, DC 20460, and the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked Attention: Desk Officer for EPA.
MECHANICS INSTRUCTIONS - PLUMBTESTMO TEST

1. Inspect the fuel filler inlet restrictor. Using a nozzle gauge with an outside diameter of 0.930 inches (2.363 cms) which is the size of a leaded fuel nozzle, verify that the fuel filler inlet restrictor has not been tampered with. If the nozzle gauge fits into the inlet restrictor (which indicates leaded fuel usage), the catalytic converter, oxygen sensor, and fuel filler inlet restrictor must be replaced (regardless of the plumbtesmo test results).

2. Do not clean or wipe inside the tailpipe prior to testing.

3. Make sure hands are cleaned before handling plumbtesmo test paper.

4. Apply 3 to 5 drops of distilled water to one strip of test paper. The paper should never be moistened such that water drips from it.

5. Press moistened strip to an area inside the tailpipe with a screwdriver (or other suitable tool) for 2 to 5 minutes.

6. Lay strip on a clean surface and let dry for 15 minutes.

7. If any shade of pink or red is indicated on the strip, the catalytic converter and oxygen sensor must be replaced. Replacement parts must be original equipment.

NOTE: It is not necessary to have the engine running while performing this test.
**Application for Final Admission - U.S. Version Vehicle**

**Warning:** Any person who knowingly makes any false or fraudulent statement or conceals a material fact shall be fined not more than $250,000 or imprisoned not more than 5 years or both. 18 United States Code 1001

<table>
<thead>
<tr>
<th>1. Port of Entry</th>
<th>2. Entry Date (mm/dd/yr)</th>
<th>3. Entry Number</th>
<th>4. Vehicle Identification Number (VIN)</th>
</tr>
</thead>
<tbody>
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</table>

**Names, Addresses, and Telephone Numbers of Relevant Parties**

<table>
<thead>
<tr>
<th>8. Vehicle Owner Name (Last, First, MI)</th>
<th>Address (Street, City, State, ZIP and Telephone Number)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>9. Vehicle Storage Location (if different than owners address)(No. P.O. Boxes)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

10. I have read and understand the warning above regarding the submission of false or fraudulent statements or concealing a material fact, and I certify that the information I have provided is correct.

<table>
<thead>
<tr>
<th>Signature of Owner</th>
<th>Taxpayer ID# (SSN)</th>
<th>Date</th>
<th>Telephone Number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

11. I certify under penalty of perjury that I am a licensed mechanic and that the catalytic converter and oxygen sensor (if the vehicle was manufactured with an oxygen sensor), have been replaced with new original equipment, or with the original catalytic converter and oxygen sensor which were removed prior to exportation from the U.S. The replaced catalytic converter and oxygen sensor are functioning properly on the vehicle identified on this form. A copy of the invoice for parts and labor is attached to this form. I have read and understand the warning above regarding the submission of false or fraudulent statements or concealing a material fact, and I certify that the information I have provided is correct.

<table>
<thead>
<tr>
<th>Signature of Licensed Mechanic</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Mailing Instructions**

Mail this form to the following address:

For delivery by a courier service:

Attn. FINAL ADMISSION
U.S. Environmental Protection Agency
Manufacturers Operations Division (6405J)
401 M. St., S.W.
Washington, DC 20460 (202) 233-9660

Or regular mail:

Attn. FINAL ADMISSION
U.S. Environmental Protection Agency
Manufacturers Operations Division (6405J)
501 3rd St., N.W.
Washington, DC 20001 (202) 233-9660

**Privacy Act Statement**

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**Paperwork Reduction Act Notice**

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CATALYST CONTROL PROGRAMS APPROVED BY EPA

Note: Not all vehicles associated with these parties are included in a retrofit program. Each vehicle which has participated in one of these programs will either have a "Catalyst Approved For Import" label under the hood (or on the door jamb) or a certification statement provided to the owner and signed by an agent of the approved company.

* These programs are approved for use by employees of the agency/organization only.

A. Manufacturers

BMW
BMW of North America
Montvale, NJ 07645
Rep: Mr. Bill Bitting
(201) 573-2195

Ferrari/Fiat
Fiat Research and Development
Parklane Towers West
Suite 1210
Dearborn, MI 48126
Rep: Mr. Mark Recchia
(313) 336-2400

Jaguar
Jaguar Cars, Inc.
Product Legislation and Compliance
600 Willow Tree Road
Leonia, NJ 07605
Rep: Ms. Diane Black
(201) 818-8171

Mercedes Benz
Mercedes Benz of North America
Product Regulation and Compliance
One Mercedes Drive
Montvale, NJ 07645
Rep: Mr. Harold Polz
(201) 573-6000

Peugeot
1099 Wall Street, West
Lyndhurst, NJ 07071
Rep: Mr. Richard Lucki
(201) 438-1113

Porsche
Porsche of North America, Inc.
100 W. Liberty Street
Reno, Nevada 89051
Rep: Mr. Mike Love
(702) 348-3000

Rolls Royce
Rolls Royce Motor Cars, Inc.
P.O. Box 476, 120 Chubb Avenue
Lyndhurst, NJ 07071
Rep: (201) 460-9600

Saab
Saab/Scania of America, Inc.
P.O. Box 697
Orange, CT 06477
Rep: Mr. David Raney
(203) 799-5671

B. Shippers

Auto Driveaway Co.
310 S. Michigan Avenue
Chicago, IL 60604
Rep: Mr. Perry L. Barcroft
(312) 341-1900
(800) 621-4155

E.H. Harms GmbH & Co.
Postfach 105040
2800 Bremen 1
West Germany
Rep: Ms. Helga Pietsch
421-3089-104

G. Albrecht Co.
Steubenstrasse 7b
Postfach 120426
2850 Bremerhaven 12
West Germany
0471-40174

The American Way
29 Market Place
Mildenhall, Suffolk IP28 7EF
England
Rep: Mr. Allan Krill
(0638) 717132

Karl Gross Co.
Hafenhaus Columbusbhf
Postfach 120244
2850 Bremerhaven
West Germany
Rep: Mr. Karl Gross
0471-4838-20

Transcar GmbH
Langer Kornweg 16
6092 Kelsterbach-Frankfurt
West Germany
Rep: Mr. Ernst P. Grossman
06107-8051

U.S. Trade Corporation
1661 Katy Lane
Fort Mill, SC 29715
Rep: Pieter Moes
(803) 548-6177

Ozark Fast Freight LTD
PSC #2
Box 1457

APO, NY 09405
Rep: Mr. Patrick Coyne
03943-6101

Volkswagen/Audi
Volkswagen of America, Inc.
888 W. Big Beaver Road
Troy, MI 48007
Rep: Mr. Leonard Kata
(313) 362-6344

Volvo
Volvo Cars of North America
Rockleigh, NJ 07647
Rep: Mr. Gregory Buffalino
(201) 768-7300

Volkswagen/Audi
Volkswagen of America, Inc.
888 W. Big Beaver Road
Troy, MI 48007
Rep: Mr. Leonard Kata
(313) 362-6344

Volvo
Volvo Cars of North America
Rockleigh, NJ 07647
Rep: Mr. Gregory Buffalino
(201) 768-7300

European Automotive Compliance
Gevers Deynootweg 1130A
2586 BX Den Haag
Holland
Rep: Mr. Mervyn Calder
31-70-539245
C. Other Organizations*

U.S. Department of Defense
Department of the Army
Deputy Chief of Staff Logistics
Washington, DC 20310
Rep: Mr. Gary Bull
(703) 614-4082

U.S. Department of State
2201 C Street, NW
Washington, DC 20520
Rep: Mr. John Miller
(202) 647-3658

Panama Canal Commission
2000 L Street, NW
Suite 550
Washington, DC 20036
Rep:
(202) 634-6441
FOR ADDITIONAL INFORMATION

If you have any additional questions that are not answered by this fact sheet, you may contact the Investigation/Imports Section by telephone at (202) 233-9660, by fax at (202) 233-9596, or by mail (regular, certified or registered) at:

U.S. Environmental Protection Agency
Manufacturers Operations Division (6405J)
Investigation/Imports Section
401 M Street, S.W.
Washington, D.C. 20460

For delivery by a courier service (e.g., Federal Express, Airborne, etc.) only, use the following address:

U.S. Environmental Protection Agency
Manufacturers Operations Division (6405J)
Investigation/Imports Section
501 3rd Street, N.W.
Washington, D.C. 20001

When calling EPA concerning a particular vehicle, please have the make, model, year and vehicle identification number (VIN) of your vehicle (from the registration card) and, if it has already been imported, the importer of record, the port of entry, date of entry and entry number (from the EPA form 3520-1) (You can only get an EPA form 3520-1 from the port of entry and you should keep a copy for your records). When writing to EPA, include this information, plus a telephone number (with area code) where you can be reached during the day.

*** For further information concerning the regulations, you may find the Federal Regulations in the September 25, 1987 Federal Register Vol. 52, No. 186 pages 36136 through 36164.
<table>
<thead>
<tr>
<th>Car Companies</th>
<th>Contact</th>
<th>City &amp; State</th>
<th>Phone No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Alpha Romeo</td>
<td>Mr. Nick D'Uva</td>
<td>Orlando, FL</td>
<td>(407) 856-5000</td>
</tr>
<tr>
<td>2. Austin Morris</td>
<td>Mr. Dennis Johnston</td>
<td>Lanham, MD</td>
<td>(301) 731-8709</td>
</tr>
<tr>
<td>3. BMW</td>
<td>Environmental Engineering Department</td>
<td>Montvale, NJ</td>
<td>(201) 307-6000</td>
</tr>
<tr>
<td>4. Chrysler</td>
<td>Customer Relations</td>
<td>Detroit, MI</td>
<td>U.S. (800) 992-1997 or Canada (313) 497-1934 or (313) 497-1961</td>
</tr>
<tr>
<td>5. Fiat, Ferrari Lancia</td>
<td>Mr. Albert Negro</td>
<td>Dearborn, MI</td>
<td>(313) 488-5600</td>
</tr>
<tr>
<td>6. Ford</td>
<td>Mr. James Dubke</td>
<td>Dearborn, MI</td>
<td>(313) 446-5961</td>
</tr>
<tr>
<td>7. GM, Opel, Vauxhall</td>
<td>Mr. Robert Cowell</td>
<td>Warren, MI</td>
<td>(313) 947-1782</td>
</tr>
<tr>
<td>8. Honda</td>
<td>Customer Assistance</td>
<td>Torrance, CA</td>
<td>(213) 783-2000</td>
</tr>
<tr>
<td>9. Hyundai</td>
<td>Mr. Iban Lee</td>
<td>Ann Arbor, MI</td>
<td>(313) 747-6600</td>
</tr>
<tr>
<td>10. Isuzu</td>
<td>Customer Relations</td>
<td>Southfield, MI</td>
<td>(313) 455-7595</td>
</tr>
<tr>
<td>11. Jaguar</td>
<td>Mr. Doug Taylor</td>
<td>Leonia, NJ</td>
<td>(201) 818-8500</td>
</tr>
<tr>
<td>12. Lotus</td>
<td>Customer Relations</td>
<td>Norwood, NJ</td>
<td>(201) 784-0726</td>
</tr>
<tr>
<td>13. Maserati</td>
<td>Mr. Donel Olso</td>
<td>Huntington Beach, CA</td>
<td>(714) 891-6821</td>
</tr>
<tr>
<td>14. Mazda</td>
<td>Mr. Takahasi</td>
<td>Ann Arbor, MI</td>
<td>(313) 930-2507</td>
</tr>
<tr>
<td>15. Mercedes-Benz</td>
<td>Product Compliance Department</td>
<td>Montvale, NJ</td>
<td>(201) 573-2784</td>
</tr>
<tr>
<td>16. Mitsubishi</td>
<td>Customer Assistance</td>
<td>Ann Arbor, MI</td>
<td>(313) 971-0900</td>
</tr>
<tr>
<td>17. Nissan-Datsun</td>
<td>Mr. Mike Beckage</td>
<td>Gardena, CA</td>
<td>(310) 719-5463</td>
</tr>
<tr>
<td>18. Peugeot</td>
<td>Mr. Richard Lucki</td>
<td>Lyndhurst, NJ</td>
<td>(201) 438-1113</td>
</tr>
<tr>
<td>19. Porsche</td>
<td>Mr. Mike Love</td>
<td>Reno, NV</td>
<td>(702) 348-3198</td>
</tr>
<tr>
<td>20. Renault</td>
<td>Mr. John Fellenberg</td>
<td>Detroit, MI</td>
<td>(313) 493-8767</td>
</tr>
<tr>
<td>21. Rolls Royce</td>
<td>Mr. Kenneth Preece</td>
<td>Lyndhurst, NJ</td>
<td>(201) 460-9600</td>
</tr>
<tr>
<td>22. Saab</td>
<td>Ms. Marylo Wickwire</td>
<td>Orange, CT</td>
<td>(203) 795-5671</td>
</tr>
<tr>
<td>23. Subaru</td>
<td>Ms. Beth Sinclair</td>
<td>Cherry Hill, NJ</td>
<td>(609) 488-8630</td>
</tr>
<tr>
<td>24. Toyota</td>
<td>Customer Assistance</td>
<td>Torrance, CA</td>
<td>U.S. (800) 822-8987 or Canada (313) 362-7300</td>
</tr>
<tr>
<td>25. Volkswagen, Audi</td>
<td>Customer Service</td>
<td>Troy, MI</td>
<td>(714) 768-7300 Ext: 7125</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Motorcycle Companies</th>
<th>Contact</th>
<th>City &amp; States</th>
<th>Phone No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. BMW</td>
<td>Environmental Engineering Department</td>
<td>Montvale, NJ</td>
<td>(201) 307-4000</td>
</tr>
<tr>
<td>2. Harley-Davidson</td>
<td>Mr. Robert Miller</td>
<td>Milwaukee, WI</td>
<td>(414) 342-680</td>
</tr>
<tr>
<td>3. Honda</td>
<td>Customer Assistance</td>
<td>Torrance, CA</td>
<td>(213) 532-9811</td>
</tr>
<tr>
<td>4. Kawasaki</td>
<td>Ms. Julie Birch</td>
<td>Santa Ana, CA</td>
<td>(714) 770-0400</td>
</tr>
<tr>
<td>5. Suzuki</td>
<td>Mr. Jeffrey Link</td>
<td>Brea, CA</td>
<td>(714) 996-7040</td>
</tr>
<tr>
<td>6. Triumph</td>
<td>Mr. Wayne Moulton</td>
<td>Placentia, CA</td>
<td>(714) 996-8200</td>
</tr>
<tr>
<td>7. Yamaha</td>
<td>Customer Relations</td>
<td>Cypress, CA</td>
<td>(714) 761-7330</td>
</tr>
</tbody>
</table>

Revised 6/3/92
The following is a list of independent commercial importers (ICIs) who hold a currently valid certificate of conformity from EPA as of the date of this list. This certificate allows the ICI to import certain nonconforming vehicles into the United States until December 31, 1992. THE MAKES OR MODELS THAT AN ICI CAN IMPORT ARE LIMITED. You should contact the ICI to determine if he/she is qualified to import your particular vehicle.

Champagne Imports Inc.
200 West 5th Street
Lansdale, PA 19446
Rep: Mr. Joe Marino
Phone: 1-800-535-9728
(215) 361-1304

ICI International
4490 35th Street
Orlando, FL 32811
Rep: Mr. Ed Sequel
Phone: (407) 839-3663

Import Trade Services USA Inc.
177 Red Hill Road
P.O. Box 677
New City, NY 10956-0677
Rep: Mr. Ken Shaffer
Phone: 1-800-USA-EPAS
(914) 638-9039
Fax: (914) 638-9016

Liphardt Associates, Inc.
15 Trade Zone Drive
Ronkonkoma, NY 11779
Rep: Mr. Peter Dibernardi
Phone: 1-800-322-3702 (in U.S.)
(516) 588-8288 (abroad)

J.K. Motorcars, Inc.
3500 Sweet Air Street
Baltimore, MD 21211
Rep: Mr. Jonathan Weisheit
Phone: (301) 366-6332

Wallace Environmental Testing Laboratories
2140 Wirtcrest
Houston, TX 77055
Rep: Mr. Les Weaver
Phone: (713) 956-7705

G & K Automotive Conversion
3251 S. Standard Ave.
Santa Ana, CA 92705
Rep: Mr. George Gemayel
Phone: (714) 545-9503

EPA DOES NOT ENDORSE OR RECOMMEND ANY PARTICULAR ICI ON THIS LIST. EPA cautions that an ICI's capability of bringing a vehicle into conformity with U.S. emission requirements does not guarantee that in individual cases the work will be properly performed. Test documentation for an individual vehicle and other information concerning the quality of modifications will be carefully scrutinized to determine whether such vehicle meets all applicable EPA requirements under the imports regulations.

This may not be an exclusive list of ICIs that are capable of modifying/testing nonconforming vehicles. Individuals should contact EPA if they need information regarding ICIs that have obtained approval since the issuance of this list.
# Application for EPA Prior Written Approval

<table>
<thead>
<tr>
<th>1. Importer's Name (Last, First, MI)</th>
<th>2. Importer's Address (Street, City, State, Zip Code)</th>
</tr>
</thead>
<tbody>
<tr>
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<thead>
<tr>
<th>3. Expected or actual date of arrival at U.S. port of entry</th>
<th>4. Vehicle Identification Number (VIN) or Heavy-duty Engine Number</th>
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<tr>
<th>5. Original Manufacturer and Model of Vehicle</th>
<th>6. Date of original manufacture</th>
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<tr>
<th>7. Date vehicle purchased</th>
<th>8. Port of entry (UNK if unknown)</th>
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<tr>
<th>9. Code letter of requested exemption or exclusion, (refer to back of form)</th>
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</table>

10. Explanation of requested exemption or exclusion, use additional sheets if necessary (attach documentation). Also, list special mailing instructions for prior approval.  

11. I certify under penalty of perjury that the information I have provided is correct and complete and that the attached documentation does not contain any false or fraudulent statements or conceal any material facts.  

<table>
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<tr>
<th>Signature of Importer</th>
<th>Daytime Telephone Number</th>
<th>Date</th>
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## Mailing Instructions and Privacy Act Statement

This form may be used to request admission by EPA of an imported motor vehicle that qualifies for an exemption from compliance with Federal emission requirements. All of the above information must be submitted in order for your case to be reviewed. Failure to submit an adequate explanation or documentation as to your qualification for an exemption or an exclusion will delay EPA's review of your case or may result in a denial of your request. When this form is completed, submit it along with proper documentation to:

- Mail this form to the following address:
  - Attn: Prior Approval
  - U.S. Environmental Protection Agency
  - Manufacturers Operations Division (6405J)
  - 401 M St., S.W.
  - Washington, DC 20460
- or regular mail:
  - U.S. Express Mail, (e.g., Federal Express, DHL, etc.)

For delivery by a courier service:

- Attn: Prior Approval
- U.S. Environmental Protection Agency
- Manufacturers Operations Division (6405J)
- 501 3rd St., N.W.
- Washington, DC 20024

Collection of the information on this form is authorized by the Clean Air Act, 42 USC sec. 7401 et seq. (see 40 CFR sec. 85.1501 et seq., Importation of Motor Vehicles and Motor Vehicle Engines). The Environmental Protection Agency (EPA) uses this information to determine compliance of imported motor vehicles and heavy-duty engines with U.S. emission requirements and for investigations with respect to EPA's import regulations. Disclosure of this information may be made to other Federal, State or local law enforcement agencies when there is a violation of civil or criminal law. Furnishing the information on this form is voluntary, but failure to do so may result in disapproval for entry into the U.S. of the motor vehicle or heavy-duty engine identified on this form.

## Paperwork Reduction Act Notice

The public reporting burden for this collection of information is estimated to average 30 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), U.S. Environmental Protection Agency, 20503, marked Attention: Desk Officer for EPA.

EPA Form 3520-14 (5-92) Previous versions are obsolete
Exemptions or exclusions are granted by EPA in the following cases (see categories on form 3520-1, item 14):

(G) Repair/Alteration Exemption - the vehicle is imported solely for repair or alteration. It may not be operated on public roads in the U.S. and it must be exported upon completion of the repair or alteration. Include location and type of repair or alteration. There is an EPA obligation on the Customs bonds for these vehicles.

(I) Testing Exemption - the vehicle is imported for testing. It may be operated on public roads provided that the operation is an integral part of the test. The vehicle may not be sold. It must be exported one year from the date of entry unless an extension is granted. The following information must be submitted to EPA: location and type of testing; a testing purpose which is appropriate for an exemption in accordance with section 233(b)(1) of the Clean Air Act; an explanation of the necessity, scope, reasonableness of the testing program; the method of disposal of the vehicle upon completion; and all other information required by 40 CFR 85.1705. There is an EPA obligation on the Customs bonds for these vehicles.

(J) Pre-certification Testing Exemption - the vehicle is imported by an ICI for testing in order to obtain a certificate of conformity. In general, an ICI may not receive more that one exemption per engine family. The vehicle must be exported in 180 days if no certificate is issued for the vehicle, and the importer must otherwise comply with the provisions of 40 CFR 85.1706. There is an EPA obligation on the Customs bonds for these vehicles.

(K) Display Exemption - the vehicle is imported solely for display. It may not be operated on public roads or sold. The following information must be submitted to EPA: a statement of the necessity of and reason for display; a schedule of dates and locations for the display program; explanation of the use of the vehicle on the roads or highways; the method of disposal of the vehicle upon completion of the display period; a description of who will view the display; a listing of all vehicles currently in the display program; a statement that the vehicle will not be sold in the U.S.; and any other information required by 40 CFR 86.1707. There is an EPA obligation on the Customs bonds for these vehicles.

(L) Racing Exclusion - the vehicle meets one or more of the exclusion criteria outlined in 40 CFR 85.1703. It may not be registered or licensed for use on or operated on public roads or highways in the U.S. The following information must be submitted to EPA: the name of the sanctioning body and competition class; a schedule of racing events, including dates and locations where the vehicle will participate; a copy of the competition racing license; a letter from the state's Department of Motor Vehicles that states that the vehicle cannot be license for use on the public streets or highways, and explains why it cannot be licensed; and four photographs of the vehicle must be included, one each of front and rear and each side. There is no EPA obligation on the Customs bonds for these vehicles.

(M) Hardship Exemption - the vehicle is imported by an individual under circumstances of severe hardship. Documentation appropriate to demonstrate the case must be submitted. This applies only to those "...unforeseen cases of extreme hardship or extraordinary circumstances." (40 CFR 85.1511(c)(2)) An example of a possible hardship exemption is a handicapped person who needs a special vehicle which is unavailable in a U.S. certified configuration. The following information must be submitted to EPA: financial information, if applicable, demonstrating need; a statement that the vehicle is strictly for personal use; and other documents relevant to the individual request. Mere lack of knowledge of the regulations or the lack of availability of an ICI to import your vehicle is not alone sufficient to grant a hardship exemption. There is no EPA obligation on the Customs bonds for these vehicles.

(M) National Security Exemption - the vehicle is imported by manufacturer for national security reasons. The request is endorsed by an agency of the Federal Government charged with responsibility for national defense (40 CFR 87.1708). There is no EPA obligation on the Customs bonds for these vehicles.