MECA’s Statement on the U.S. EPA’s Cleaner Trucks Initiative ANPRM

The Manufacturers of Emission Controls Association (MECA) supports the decision of the U.S. Environmental Protection Agency (EPA) to issue today an advance notice of proposed rulemaking (ANPRM) to solicit early input on a variety of potential regulatory provisions being considered under the Cleaner Trucks Initiative (CTI). The ANPRM provides the agency the opportunity to review the latest information from industry, states, and other stakeholders to help them develop a truly innovative and holistic proposal that addresses real, on-the-road emission reductions from heavy-duty trucks at a national level.

MECA believes that additional NOx emission reductions from new heavy-duty engines beyond the current EPA 2010 requirements are achievable and cost-effective by combining the improvements made to engines, emission control technologies, and fuels over the past twenty years. The emission control technologies that will deliver lower NOx emissions in the future will not look much different than they do today, incorporating advancements in substrates, catalysts, exhaust gas recirculation, turbochargers, fuel injectors, and calibrations. MECA and its member companies have been supporting the technical work being conducted at EPA’s laboratory in Ann Arbor and the testing at Southwest Research Institute being funded by the California ARB, EPA, South Coast AQMD, MECA, and engine manufacturers. The results from these studies will demonstrate the ability of fully aged advanced aftertreatment systems to achieve ultra-low NOx emissions while simultaneously improving fuel efficiency over current certification cycles as well as a newly developed low-load cycle.

The CTI could provide an important compliance pathway to help areas across the country to meet the National Ambient Air Quality Standards for ozone and particulate matter. Nonattainment areas in the U.S. will continue to need strategies that reduce NOx emissions in order to meet ozone attainment deadlines. MECA funded an independent study in 2015 to better understand the potential NOx reduction benefits of an updated, national heavy-duty program (http://www.meca.org/resources/MECA_NOx_Modeling_Report_0618.pdf). Using EPA
MOVES modeling, the study forecasted that an assumed 90% reduction in NOx below current emission levels for trucks could achieve as much as 130,000 tons per year in NOx reductions across the country (excluding California) in 2030 and over 270,000 tons per year as the rule is fully implemented and the fleet turns over to the cleanest trucks.

Over the past 50 years, EPA’s emission reduction policies for mobile sources have not only delivered important health benefits but have also helped create an industry with a significant number of highly skilled jobs and a global economic reach. According to data collected by MECA, member companies are supporting over 70,000 jobs across North America. This employment figure does not include the tens of thousands of additional jobs in the automobile, truck, and engine manufacturing industries that are involved with installing these technologies on today’s vehicles. MECA estimates the size of the emission control technology market for new light-duty and heavy-duty vehicles in North America in 2020 will be approximately $25 billion and over $100 billion globally. MECA expects this economic activity to grow even more as the industry invests to meet the requirements of future air quality regulations such as the CTI.

The ANPRM will also provide an opportunity for EPA to review comments on important elements of a comprehensive heavy-duty program, including improvements to on-board diagnostic monitoring, emissions warranties, and certification and in-use testing protocols, to ensure cost-effective emission reductions occur in the real world and not just in the laboratory.

“MECA and our member companies have played an important role in the air quality success story associated with heavy-duty vehicles in the U.S., and for over 40 years we have supported EPA’s efforts to develop technology-neutral emission control programs to mitigate air pollution problems and minimize the impacts of climate change,” said MECA’s Executive Director, Rasto Brezny. “We look forward to providing detailed comments on this ANPRM and continuing to support the technical work of EPA on this important agency initiative.”

Founded in 1976, MECA is a nonprofit trade association of the world’s leading manufacturers of clean technology solutions for all mobile sources. For more information, please visit us on our website (www.meca.org) and on Twitter (@MECAforCleanAir).

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