

**COMMENTS OF THE
MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION
ON CALIFORNIA AIR RESOURCES BOARD'S MODIFIED TEXT AND
AVAILABILITY OF ADDITIONAL DOCUMENTS FOR THE PROPOSED
AMENDMENTS TO THE HEAVY-DUTY ENGINE AND VEHICLE
OMNIBUS REGULATION AND ASSOCIATED AMENDMENTS**

June 4, 2021

The Manufacturers of Emission Controls Association (MECA) would like to provide comments in strong support of the California Air Resources Board's (CARB) proposed 30-day changes to the Heavy-Duty Low-NOx Omnibus Regulation. By setting more stringent standards and other requirements for the medium- and heavy-duty truck sector, this rulemaking will reduce the amount of harmful emissions generated from on-road mobile sources. We support CARB's ongoing leadership in the effort to reduce the environmental footprint of transportation to meet the state's SIP and climate goals, including technology advancing regulations that provide pathways to clean up the heavy-duty vehicle fleet. We appreciate CARB staff reviewing the comments from a diverse group of stakeholders and reflecting several of the recommendations in the proposed amendments. We support the changes proposed by CARB staff and believe that these amendments make the Omnibus a stronger regulation.

MECA is an industry trade association of the world's leading manufacturers of clean mobility technology. Our members have nearly 50 years of experience and a proven track record in developing and commercializing emission control, efficiency and electric technology for a wide variety of on-road and off-road vehicles and equipment in all world markets. Our members provide the technologies that enable heavy-duty on-road vehicles to meet the most stringent NOx and PM emission standards, as well as electrification and all-electric technologies that reduce emissions of all pollutants, criteria and climate, and allow commercial vehicles to be the cleanest possible. Our industry has played an important role in the environmental success story associated with light- and heavy-duty vehicles in the United States and has continually supported CARB's efforts to develop innovative, technology-advancing, regulatory programs to deal with air quality and climate challenges.

At the time of the Board approval of the Omnibus package, the third and final stage of the CARB Low-NOx Demonstration Program was being wrapped up by Southwest Research Institute (SwRI). Since then, EPA has been conducting its demonstration program and has benefitted from the lessons learned during the CARB demonstration. The preliminary results from the EPA efforts are very encouraging and improvements over the CARB Stage 3 results have already been indicated. These results are due to further advances in catalyst and architectures through incorporation of evolutionary improvements on commercial technology in CARB's demonstration program at SwRI. This example of continual improvement and optimization is a testament to the ongoing innovative technology development that occurs in the industry between suppliers and their OEM customers.

In our comments on the Omnibus Board package from August 2020, MECA made several suggestions that we thought would strengthen the regulation. These are noted below along with

our feedback based how CARB staff addressed our comments in the 30-day changes.

1. We encouraged CARB to explore a collaborative demonstration program that could be undertaken in the years leading up to implementation of the Omnibus requirements and designed to work with truck fleets to survey field aged parts on in-use trucks to examine real-world deterioration from a representative cross-section of vehicle age, state of repair and ownership status. We thank CARB staff for their ongoing work to convene an industry group to work to reduce the uncertainty with costs associated with future warranty requirements. As U.S. EPA works on the proposed federal low-NOx regulation, we encourage continued collaboration and discussion between CARB and U.S. EPA so that California and federal durability and warranty requirements can be harmonized on a feasible timeline that is based on the best available data. There remain some vehicle operation and use characteristics that are still not well understood, including characteristics of vehicle operation by second and third owners.
2. We recommended that HD ZEV NOx credits issued for electric trucks under the Omnibus be limited to only the earliest years of implementation to provide flexibilities to truck manufacturers to introduce the cleanest diesel trucks in the state as early as possible while limiting potential excess NOx emissions. We thank CARB for limiting the use of credits earned through compliance with the Advanced Clean Trucks Regulation by sunseting HD zero-emission NOx credits by MY 2026.
3. We urged CARB to review the U.S. EPA final CTI (HD low-NOx) rule and consider harmonizing tailpipe limits and evaporative and refueling control requirements for gasoline engines as part of future heavy-duty Omnibus amendments. HD gasoline engines should be subject to the same PM standards as HD diesel engines. Furthermore, we believe that an opportunity exists to significantly reduce VOC emissions from gasoline heavy-duty engines by expanding Onboard Refueling Vapor Recovery (ORVR) to incomplete HDGVs rated over 14,000 lbs. Gross Vehicle Weight Rating (GVWR). Finally, we believe that technology available for reducing exhaust emissions from light-duty vehicles and medium-duty chassis certified vehicles has advanced significantly and can be applied to engine certified products, and we support CARB's current efforts in Advanced Clean Cars II to align chassis certification standards with engine certification standards through harmonization of the MAW in-use testing requirement.
4. We suggested that CARB consider funding an on-road demonstration of the low-NOx engine from SwRI after installation in a vehicle. There is likely to be an on-road low-NOx demonstration through a collaboration between U.S. EPA, industry and other air quality agencies. We appreciate any support CARB may provide to this effort.
5. We encouraged CARB to continue development of a robust heavy-duty I/M program. To ensure truck engines and aftertreatment systems are properly maintained and operating over their full useful life especially after the warranty has expired will require periodic inspection. This is particularly true for large class 7 and 8 tractor trailer trucks that may be on their second or third owner. MECA has been engaged in the heavy-duty I/M workshops and supports CARB's activities to develop a HD I/M program.

Conclusion

MECA strongly supports CARB's proposed Omnibus Regulation, including the 30-day changes proposed by staff. This regulation will result in cost effective air quality benefits for millions of Californians living in nonattainment areas and/or along highways, ports and other freight corridors. MECA believes that the emission limits and implementation timeline of the Omnibus are technologically achievable and cost effective. We urge CARB to work with U.S. EPA to adopt a national set of harmonized standards. We also wish to thank CARB staff for its willingness to work closely with all interested parties and for considering our comments on the proposal. Our industry is prepared to do its part and deliver cost-effective and durable advanced emission control and efficiency technologies to the heavy-duty sector to assist in simultaneously achieving lower GHG and NOx emissions, while also meeting other criterial pollutant standards.

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