

**STATEMENT
OF THE
MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION
ON THE AIR RESOURCES BOARD'S
PROPOSED AMENDMENTS TO REGULATIONS FOR NEW AFTERMARKET AND
USED CONVERTERS OFFERED FOR SALE AND USE IN CALIFORNIA**

October 26, 2007

MECA is pleased to provide testimony in support of ARB's proposed amendments to regulations for new aftermarket and used converters offered for sale and use in California. We believe that the proposal presents a balanced, fair, and flexible approach that will achieve significant reductions in hydrocarbon (HC) and nitrogen oxide (NOx) emissions in a cost-effective manner. We commend ARB staff for their hard work and commitment to work with all stakeholders throughout the regulatory process.

MECA is a non-profit association of the world's leading manufacturers of emission control technology for motor vehicles. Our members have over 30 years of experience and a proven track record in developing and manufacturing emission control technology for a wide variety of on-road and off-road vehicles and equipment. This includes supplying reliable aftermarket replacement converters in California and across the country. A number of our members have extensive experience in the development, manufacture, and application of three-way catalyst technologies to help enable motor vehicles to meet existing LEV II and Tier 2 emission standards for new vehicles.

MECA and our members have a long history of cooperative interaction and a strong working relationship with ARB in developing replacement converter regulations. MECA has supported ARB's aftermarket regulation developments for over 20 years, dating back to the original regulations for replacement converter certification in California in August of 1988. Our members worked closely with ARB staff in the late 1990s to amend the aftermarket converter regulations to require the sale of OBD-compatible aftermarket replacement converters in California and advance the level of emissions control technology to be compatible with in-use, OBD-equipped vehicles. This resulted in a memorandum of understanding that was put in place with ARB in late 2001 that established guidelines for testing and other criteria required to grant Executive Orders for OBD II-compatible aftermarket converters. In developing the current proposal, MECA and our members actively participated for over two years in the regulatory process, including providing staff with comments regarding the capabilities of advanced technologies and the latest quality control procedures being applied to aftermarket converters. Throughout the entire history of ARB's aftermarket converter activities, MECA members have provided converter samples to ARB staff to facilitate their understanding of the performance and durability of aftermarket converter technologies.

We believe that an important opportunity exists to significantly reduce emissions from the existing light-duty passenger car and truck fleet by applying the types of advanced catalyst technologies that are being used on all new vehicles sold in California since 2004 to aftermarket

converters. Our members have invested and continue to invest significant resources in developing, optimizing, and commercializing advanced emission control technologies to enable new and in-use motor vehicles to meet the most stringent standards for emissions. The additional requirements outlined in this proposal would ensure that aftermarket converters are fully compliant with the diagnostic systems on 1996 and newer model year vehicles. In this way, the OBD II system would detect a malfunctioning converter before its emissions exceed the prescribed threshold limits. Furthermore, the proposed amendments will extend these advanced catalysts to pre-1996, non-OBD II vehicles so that they may benefit from the same advanced catalyst technologies used on vehicles equipped with OBD II systems and significantly reduce emissions of hydrocarbons and NO_x that contribute to ozone and secondary PM formation.

The tighter emission standards and durability requirements for new light-duty vehicles required by California's LEV II and the Federal Tier 2 regulations have led to significant advances in three-way catalyst performance and durability. To meet durability requirements for new catalysts that range from 120,000 to 150,000 miles, catalyst manufacturers have developed technologies based on more thermally durable materials. To ensure that catalysts are compatible with the OBD II system and do not cause the vehicle's MIL to illuminate when the catalyst is functioning properly, manufacturers have developed advanced catalyst coating practices and implemented tight quality control procedures in their processes. These advances result in catalysts that can survive high temperature exposure and deliver the required performance over a longer useful life. These new materials and technologies have been applied to existing OBD II compatible aftermarket converters and can readily be extended to all aftermarket converters sold in California to meet the 5-year, 50,000-mile warranty outlined in the staff proposal. MECA member companies have already begun developing and certifying new technologies to broaden the availability of aftermarket converters that comply with the proposed amendments beyond those available today.

The benefit of applying advanced OBD II-compatible converters on non-OBD vehicles is evident from the ARB test results outlined in the staff report. After approximately 8,000 miles of mileage accumulation, the advanced catalysts resulted in 50-75% lower emissions of all three criteria pollutants compared to the current aftermarket catalyst technology. Furthermore, the advanced catalysts demonstrated far better durability, resulting in 60% less deterioration in HC emissions and 75% less deterioration in NO_x emissions after mileage accumulation relative to today's aftermarket converters used on pre-OBD vehicles. This corresponds to estimated emissions benefits of 5.3 tons/day of HC and 31.3 tons/day of NO_x from the existing vehicles that are equipped with aftermarket converters. These reductions will make a significant contribution towards California meeting its ozone and PM_{2.5} air quality commitments, in particular in the South Coast and the San Joaquin Valley air districts.

The proposed regulation will bring aftermarket converter technology to a level that will ensure that vehicles continue to have low emissions throughout their lifetime. To achieve the emissions objectives of this regulation, manufacturers must demonstrate that aftermarket converters are fully compatible with a vehicle's OBD II system. This will require extensive durability and emissions testing to ensure that the system is functioning properly and the emission control system meets certification emission standards for the full 50,000 miles or 5-year useful life. MECA members have agreed to these requirements along with the additional

quality and reporting requirements outlined in the proposal. We believe that these stringent guidelines are important to ensure that only aftermarket technologies capable of achieving the highest standards of quality and performance are sold in California.

Conclusion

In closing, we commend the Air Resources Board for its continuing efforts to provide the people of California with healthy air quality and for demonstrating true leadership in continuing to develop innovative emissions regulations. Adoption of the current proposal will significantly reduce HC and NOx emissions from existing light-duty gasoline passenger cars and trucks operating in the State. We also wish to thank the ARB staff for its willingness to work closely with all interested parties and for its tireless efforts to develop this cost-effective regulatory proposal. Our industry pledges its continued support and commitment to ensure that the technologies are available to deliver the desired emission reductions outlined in this proposed regulation.

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