

*Comments
of the
Manufacturers of Emission Controls Association
on the Air Resources Board's Consideration of
Diesel Emission Control Strategy Verification Procedures, Warranty, and In-Use
Compliance Requirements*

May 16, 2002

Good Morning. My name is Bruce Bertelsen and I am the Executive Director of the Manufacturers of Emission Controls Association. MECA is pleased to provide comments in support of the Air Resources Board's proposed regulations establishing verification procedures, warranty requirements, and in-use compliance requirements for diesel emission control strategies for existing on-road, off-road and stationary diesel-fueled vehicles and equipment. We believe the proposed regulations present a balanced, fair, and flexible approach and will serve a critical role in advancing ARB's Diesel Risk Reduction Plan (DRRP) and will help ensure that the objectives of that program are achieved.

We wish to take this opportunity to thank the ARB staff for its willingness to work with MECA, our members, and the other stakeholders in developing the proposed regulations and for its extraordinary efforts in developing an effective program that will serve as a model for other retrofit programs likely to be implemented in the U.S. and around the world in the future.

MECA is a non-profit association of the world's leading manufacturers of emission control technology for motor vehicles. Our members have decades of experience and a proven track record in developing and manufacturing emission control technologies for a wide variety of on- and off-road vehicles and equipment in both original equipment (OE) and retrofit.



ARB's DRRP has served to stimulate significant efforts on the part of our members and others in the development, optimization, manufacture, and commercial application of diesel retrofit emission control technology.

The end result of these efforts will be a growing number of technology options for a growing number of retrofit applications. These technologies will help ARB meet the objectives of the DRRP.

Discussion

An effective diesel emission control verification and in-use compliance program must address two critical elements. First, the program must ensure that the technology verification procedures and in-use performance are sufficiently rigorous to ensure that the technologies and strategies approved by ARB meet the emission control performance levels not only initially, but in-use as well. Second, the procedures should not be overly burdensome such that manufacturers with effective technology that could provide significant PM reductions are dissuaded from attempting to verify their technologies in California.

We believe the application process, the emission testing requirements, the durability testing requirements, the field demonstration requirements, the warranty requirements, and other provisions in the proposed regulations have effectively addressed both of these important considerations.

We strongly support the proposal to create multiple verification classifications for both PM and NOx reduction strategies. This innovative approach will help to stimulate efforts to develop, optimize and verify the most effective strategies feasible for the full range of on-road, off-road, and stationary diesel vehicles and equipment.

MECA also supports ARB's willingness to consider accepting test data generated under the U.S. EPA's voluntary retrofit program. Allowing data generated by manufacturers seeking to verify technologies and strategies under both the ARB and EPA programs will substantially reduce the overall costs and time that otherwise would be needed to generate two sets of data – one for ARB and one for the U.S. EPA. The time and resources saved can be devoted to generating test data to support verifying a greater number of technologies and/or a broader range of engine applications on which these technologies can be utilized.

We also support ARB's intent to allow verification of technologies using test data generated on alternative test procedures where the ARB has determined this is appropriate. Permitting the use of alternative test procedures to generate data will provide manufacturers greater flexibility in verifying retrofit emission control technologies and as a consequence, result in the broadest range of cost-effective retrofit emission control technologies being available to reduce emissions from in-use diesel engines in California.

The verification procedures require additional testing where an engine is equipped with an auxiliary emission control device (AECD) in order to determine the impact of the retrofit device on the emission performance of an engine equipped with an AECD. Some retrofit NOx emission control technologies operate completely independent of the operation of an engine that may be equipped with an AECD and will not impact the engine out emissions. We look forward to working with ARB to define criteria under which the requirement for additional NOx emission testing for engines incorporating AECDs could be waived by Executive Order in those cases where the NOx retrofit device operates completely independent of an engine that may be equipped with an AECD.

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 implementing the Diesel Risk Reduction Plan and in establishing an innovative verification and in-use compliance program.

Our industry pledges its continued commitment to support ARB's initiatives and to ensure that technologies and strategies are available to help achieve the objectives of the Diesel Risk Reduction Plan.

Thank you.