

**COMMENTS
OF THE
MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION
ON THE AIR RESOURCES BOARD'S
PROPOSED REVISIONS TO THE URBAN BUS FLEET RULE**

October 24, 2002

The Manufacturers of Emission Controls Association (MECA) is pleased to provide comments in support of the proposed revisions to the Air Resources Board's program to reduce emissions from urban buses. As stated on previous occasions, we believe the urban bus fleet rule is a balanced, fair, and flexible approach to achieve significant emission reductions in a cost-effective manner. The proposed revisions designed to give transit operators even greater flexibility in their strategies to reduce the PM emission levels of existing buses is consistent with the spirit of and enhances the overall effectiveness of the program. We commend the Board for its leadership in adopting what has widely been recognized as a ground-breaking program and the ARB staff for its willingness to work with all interested parties to find effective, workable strategies to implement the program.

The adoption of the urban bus emission control program in early 2000 has helped encourage considerable investment and effort in developing the technologies to meet the requirements of not only the urban bus program, but emission control strategies for other diesel-powered vehicles and equipment as well. While challenges have arisen in implementing the program, we believe excellent progress is being made and the program is on track to achieve its desired objectives. The retrofit portion of the urban bus program provides important, immediate emission reduction benefits and offers an opportunity to demonstrate the effectiveness of a retrofit strategy. Also, the urban bus retrofit program can serve as a model for possible other future initiatives to reduce PM emissions from other categories of existing diesel-powered vehicles and equipment operating in urban areas.

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. A number of our members have extensive experience in the development, manufacture, and commercial application of emission control technology for heavy-duty diesel engines like those used in urban buses. Several of our members have verified diesel particulate filters that can be utilized on urban buses, as well as other heavy-duty vehicles and other companies are in the process of verifying retrofit technologies for urban buses and other applications. Several of our members are also developing and applying retrofit NOx control technologies such as selective catalytic reduction (SCR) and exhaust gas recirculation (EGR).



We strongly support the staff's recommendation to revise the current regulations to give transit authorities the flexibility to develop strategies to reduce PM emissions from existing buses. One significant benefit of this added flexibility is that transit agencies will be able to retrofit the newer, 1994 and later model year bus engines earlier than was provided in the existing program. Allowing transit authorities the flexibility to retrofit 1994 and later model year bus engines earlier than originally contemplated by the rule encourages the use of demonstrated technology that has proven its effectiveness on the category of bus engines that will be candidates for retrofit.

Almost 2000 diesel particulate filters have already been installed and are performing effectively on 1994 and newer model year urban bus engines throughout the U.S., with approximately 300 of these filters installed on urban buses in California. Filters equipped on these model year engines and operated on ultra-low sulfur fuel have repeatedly demonstrated the ability to achieved total PM reductions of greater than 90 percent, a 99+ percent control of carbon-based ultra-fine particles, the elimination of diesel smoke and odor, and greater than a 90 percent reduction in those hydrocarbon species ARB has identified as toxic. Allowing transit authorities the flexibility to retrofit buses with well-proven technology will provide immediate, significant reductions of harmful pollutants on vehicles likely to be operated for considerably greater mileage on an annual basis than older buses.

MECA concurs with the ARB staff's conclusions that the pre-1994 MY engines, as well as two-stroke engines, are technologically more challenging than the 1994 and later MY four-stroke engines. By allowing transit authorities to pursue strategies that will include retrofitting the 1994 and later model year buses first, more time is made available for technology providers to continue to develop effective control strategies for the older buses and the buses with two-stroke engines. Our industry looks forward to working with the Board, the ARB staff, transit authorities and others to explore and develop control strategies for the more technically difficult applications.

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 this innovative regulatory program that will significantly reduce emissions from urban buses 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 effective implementation strategies. Our industry pledges its continued support to ensure that this important regulatory initiative is a success and the desired emission reductions are effectively achieved.

Thank you.