

**Statement of the
Manufacturers of Emission Controls Association
on the California ARB's Proposed Certification Procedures for Light-Duty Engine
Packages for Use in Light-Duty Specially Constructed Vehicles for 2012 and Subsequent
Model Years**

November 16, 2011

The Manufacturers of Emission Controls Association (MECA) is pleased to provide comments in support of the California ARB's Proposed Certification Procedures for Light-Duty Engine Packages for Use in Light-Duty Specially Constructed Vehicles for 2012 and Subsequent Model Years. Creating an optional certification path for low-emitting engine packages for use in specially constructed vehicles (SPCNSs) could result in significant emission benefits from these vehicles compared to existing SPCNS practices.

MECA is a non-profit association of the world's leading manufacturers of emission control technology for motor vehicles. Our members have over 35 years of experience and a proven track record in developing and manufacturing emission control technology for a wide variety of gasoline and diesel on-road and off-road vehicles and equipment. A number of our members have extensive experience in the development, manufacture, and application of three-way catalyst technology for both new and in-use new light-duty vehicles to meet existing and future U.S. EPA and ARB emissions standards.

Staff's proposed certification regulations and procedures will allow manufacturers to certify engines for use in light-duty SPCNSs and provide hobbyists low-emission options when it comes to choosing an engine. The proposed rulemaking provides the necessary flexibility needed for the unique characteristics of SPCNSs, while ensuring new SPCNSs are as low-emitting as new production light-duty vehicles.

MECA agrees with ARB staff that the proposed regulation and certification procedures should require certified engine packages to meet current Low Emission Vehicle (LEV II) exhaust and evaporative standards. As noted in the Staff Report, for MY 2012 and subsequent engine packages, in order to receive certification, the engine package would be required to come with exhaust and evaporative emission components such as intake and exhaust manifolds, engine controller, catalytic converter, an evaporative canister, and detailed instructions for the proper installation of the package. The components required are consistent with exhaust emission controls required for new vehicles. These exhaust and evaporative emission components are proven technologies that are designed to meet stringent performance and durability requirements under existing California LEV II and Federal Tier 2 regulations (and any future LEV regulations that may go into effect). Requiring manufacturers to provide the emission control components in the engine package will help ensure an SPCNS stays low-emitting throughout the life of the vehicle and can pass future Smog Check tests.

MECA also supports staff's proposal that shops that help install these certified engine packages be required to maintain records and provide an installation warranty. Maintaining a paper trail on these vehicles is essential for enforcement and in-use compliance purposes

(especially since there will be no actual in-use testing required as part of this proposed rulemaking).

The proposed optional certification regulations and procedures will likely result in criteria pollutant benefits in California. According to the Staff Report, engines certified through the proposed procedure are expected to provide an air quality benefit in terms of reduced emissions as compared with current practices to the extent that they result in hobbyists building SPCNSs to use certified engines instead of uncontrolled engines. Staff estimated that a typical SPCNS today emits 1.3 to 3.4 times the amount of NOx and HC emissions per year as an average new MY 2010 passenger car. The proposed regulation will enable manufacturers to certify engine packages to be essentially as low-emitting as new passenger cars. Therefore, hobbyists who choose to buy such certified engine packages will have the potential to significantly reduce (by a factor of more than 30 on a per mile basis, says ARB staff) their emissions below what they otherwise would have been had they chosen an uncontrolled engine that emits like the engine found in a typical SPCNS today.

If more hobbyists begin to choose low-emitting certified engine packages as a result of this rulemaking, this could significantly lower smog-forming emissions from SPCNSs in the future. Thus, even though the emission reductions resulting from adoption of the proposed regulation would affect only a small subset of light-duty vehicle statewide, the reduction in smog-forming emissions could help California meet its air quality obligations under its State Implementation Plan (SIP).

In closing, we commend ARB for its continuing efforts to provide the people of California with healthy air quality and for demonstrating leadership in continuing to develop innovative emission control regulations. An effective certification path for SPCNSs is an important element of ARB's comprehensive motor vehicle emission control program. We believe that the proposed rulemaking presents a balanced, fair, and flexible approach that will ensure that SPCNSs achieve the same NOx and HC emission reductions as intended from new production light-duty vehicles.

Contact:

Joseph Kubsh
Executive Director
Manufacturers of Emission Controls Association
2020 North 14th Street
Suite 220
Arlington, VA 22201
Tel.: (202) 296-4797 x107
E-mail: jkubsh@meca.org