

**WRITTEN STATEMENT  
OF THE  
MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION  
ON THE U.S. ENVIRONMENTAL PROTECTION AGENCY'S PROPOSAL TO  
REVISE THE NATIONAL AMBIENT AIR QUALITY STANDARDS FOR LEAD  
DOCKET ID NO. EPA-HQ-OAR-2006-0735**

*August 4, 2008*

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The Manufacturers of Emission Controls Association (MECA) is pleased to provide testimony in response to the U.S. EPA's request for public comment on the Proposal to Revise the National Ambient Air Quality Standards for Lead (Docket ID No. EPA-HQ-OAR-2006-0735).

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 technology for a wide variety of on-road and non-road vehicles and equipment.

MECA will defer to the health experts to determine the appropriate lead levels for the ambient standards given that they are not within our area of expertise; however, MECA believes that the available health studies confirm that EPA should set an even tighter ambient standard for lead, relative to the current EPA standard. The Clean Air Act does require that these standards be set to protect the public health with an adequate margin of safety.

MECA offers comments here regarding the importance of adopting a more stringent U.S. lead emissions standard as a benchmark for developing countries that still use leaded gasoline. Unleaded gasoline is now used in much of the world, but leaded gasoline is still used in a small number of developing countries as the main fuel for the spark-ignited engines used in passenger cars, light-duty trucks, two-wheeled vehicles, and off-road SI engines used in materials handling equipment, as well as lawn and garden equipment. Eighty percent of airborne lead comes from combustion of leaded gasoline, and airborne lead is found responsible for adversely affecting the mental and physical development of children.

The use of unleaded gasoline would not only eliminate airborne lead from leaded gasoline combustion, but it would also enable the use of vehicle emission control technologies to achieve a significant improvement in air quality. Lead in gasoline severely limits exhaust emission control options because it completely destroys the effectiveness of catalytic converters designed to operate on spark-ignited engines, the most commonly used exhaust emissions control system. Catalytic converter technology has been used around the world for over 30 years, with over 90% of the new cars and small trucks sold today using this technology. Catalytic converters on vehicles significantly reduce harmful air pollutants, such as carbon monoxide, hydrocarbons, and nitrogen oxides, by more than 90%. Unleaded gasoline is essential to the use of catalytic converters as even trace levels of lead rapidly deactivates the performance of the device. In order to realize the significant air quality benefits of advanced emission control technologies, the switch to unleaded gasoline is a critical first step. Additionally, lead in gasoline also has other

negative effects on a modern vehicle's engine and exhaust system. These negative effects include: the corrosion of exhaust valve materials, the contamination of engine oil with corrosive acids, the fouling of spark plugs, and the corrosion of exhaust systems. Using unleaded gasoline can extend engine life by 1.5 to 2 times, and spark plug and exhaust system life is considerably extended as well.

In closing, MECA believes that setting stringent a more stringent lead emissions standard is an important benchmark, not only to reduce the adverse health effects from lead in the United States, but it also serves as an important example to developing countries that have yet to switch to unleaded gasoline. Implementation of stringent lead standards in U.S. would send a strong signal to the developing nations of the benefits associated with eliminating leaded gasoline. Elimination of leaded gasoline would also enable these nations to use advanced vehicle emission control technologies to achieve significant improvements in air quality.

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