

Good morning, I am Rasto Brezny, the Executive Director for the Manufacturers of Emission Controls Association and I thank you for this opportunity to share our initial thoughts on the proposed truck rule. From clean combustion to electrification, MECA members are delivering the technology solutions for clean mobility.

The process to develop the current proposal has been a monumental effort that included a comprehensive test program at Southwest Research Institute and involved technical experts from industry, national laboratories and government agencies.

MECA supports technology neutral standards founded on performance based cost-effective solutions. We support EPA's decision to include many of the provisions from the California Omnibus rule in Option 1 because suppliers agree that national vehicle standards are the most effective way to reduce emissions while controlling costs. We support the refueling control provisions for incomplete heavy-duty gasoline vehicles to capture VOCs from this truck category.

However, we believe the 2027 to 2030 Option 1 requirements can be improved through closer alignment with the Omnibus while considering new test information and potentially reducing the low load and idle limits to prevent emission backsliding when operating in urban settings. We suggest setting an intermediate life standard in 2027 to keep marginally designed emission control systems off the roads. This approach has precedence and better aligns with a single national program.

We recommend that EPA reconsider the structure of credit flexibilities in three primary areas to prevent the erosion of NOx reduction benefits from combustion engines. First, we believe the 2027 FEL caps should be tightened to align with California. Second, ZEVs be excluded from generating NOx credits. CARB recognized the deteriorating emissions impact of NOx credits on the non-electric fleet and sunset these credits generated by electric trucks in 2026. Third, ZEV GHG credit multipliers are overly generous and should be phased out even faster than proposed. Numerous studies, including from the ICCT and Carnegie-Mellon, have found these multipliers erode CO₂ reductions from diesel trucks while potentially reducing electric vehicle sales. These minor improvements to Option 1 would lead to the cleanest diesel engines while accelerating electric truck penetration through the Phase 2 revisions.

MECA thanks EPA for conducting their independent cost analysis to provide yet another methodology that supports previous analyses conducted by CARB, ICCT and MECA. One area of concern that represents uncertainty on its cost impact for suppliers remains the durability and warranty provisions especially for on-engine components whose deterioration cannot be accelerated. We will elaborate on this in our written comments but we agree with EPA staff that this is an area for additional demonstration and data gathering. My colleague Kevin Brown will elaborate on the technologies important for reducing emissions from trucks.

I'm Kevin Brown with MECA and I would like to highlight the work to demonstrate additional complementary technologies since CARB adopted the Omnibus. These commercial technologies, already deployed on some passenger vehicles, will further benefit trucks by building greater compliance margin that the truck manufacturers need to manage real world variability. Technologies such as cylinder deactivation, active heating, driven turbos, or hybrid powertrains can simultaneously reduce NOx and CO₂. Combining these engine technologies with close-coupled catalyst designs that leverage decades of experience with SCR system designs, will help heavy-duty engines and vehicles meet tighter NOx and Phase 2 GHG standards.

Since the Southwest Research test program began over seven years ago, suppliers have provided three generations of technology, each better than the last, including, catalyst improvements and exhaust system optimization in the two and a half years since CARB finalized their rule. EPA's contribution to the test program has provided data on end-of-life durability, performance over real-world cycles, in-use system compliance with the new moving average window requirements, emission sensor measurement capability among others.

Testing over multiple real-world driving cycles has shown that the same technologies that delivered the 20 mg/bhp-hr level of NOx emissions over today's certification cycles delivered even greater reductions under low-load conditions where it counts the most- for urban areas, freight corridors and disadvantaged communities.

Most importantly, finalizing these regulations will be the spark that starts the real collaborative process between suppliers and their customers to integrate the cleanest and most cost-effective combinations of technology solutions onto trucks over the next 4-7 years and beyond. In addition, California's initial implementation in 2024 of a 50 mg NOx limit will provide the industry an opportunity to use existing aftertreatment architecture while gaining experience with the new provisions of the rule including the low load cycle and compliance programs.

Similar to other areas of technology innovation, the forecasts of electrification for the commercial vehicle sector have undergone rapid evolution over the past several years and Europe has set aggressive targets for CO₂ reductions for heavy-duty trucks out to 2030. We urge EPA to review this new information before finalizing Phase 2 vehicle CO₂ reduction targets which appear to be conservative.

We thank EPA staff for their comprehensive research and collaboration with all stakeholders. MECA strongly urges EPA to finalize this truck rule by the end of this year so it can be implemented in 2027.

Our industry remains committed to delivering cost-effective and durable advanced emission control and electric technologies that simultaneously achieve lower GHG and NOx emissions from all trucks. Thank you for your time and I am happy to answer any questions that you might have.