



**Manufacturers of Emission Controls Association**  
2101 Wilson Blvd. Suite 530  
Arlington, VA 22201  
(202) 296-4797

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**COMMENTS OF THE MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION  
ON THE DEVELOPMENT OF GUIDANCE FOR ALTERNATIVE FUEL VEHICLES AND FUELING  
INFRASTRUCTURE DEPLOYMENT UNDER THE CLEAN SCHOOL BUS FUNDING PROGRAMS**

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The Manufacturers of Emission Controls Association (MECA) offers comments in response to the Environmental Protection Agency (EPA) request for information on the development of guidance for alternative fuel vehicles and fueling infrastructure deployment under the Clean School Bus Funding Programs.

MECA is a non-profit industry association of the world's leading manufacturers of technologies for clean mobility. MECA has represented clean mobility suppliers for over 50 years who have a proven track record in developing and manufacturing components that reduce the environmental impact of all mobile sources. These include fuel efficiency and electric components, emission control and battery materials for a wide variety of on-road and off-road vehicles and equipment in all world markets. Our industry has played an important role in the emissions and vehicle efficiency success story associated with light-, medium- and heavy-duty vehicles in the United States, and has continually supported efforts to develop innovative, technology advancing policies to improve vehicle efficiency that yield fuel savings for consumers. This includes the Clean School Bus Program in which MECA member companies developed, commercialized and verified a wide range of retrofit emission controls which are now broadly deployed technologies on all new school buses today.

Foremost, MECA recommends that the Clean School Bus program should be performance-based, cost effective and include a diversity of powertrains and alternative fuels to address the varying needs and situations of school bus fleets across the country to ensure the transportation equity of school children.

Towards these objectives, MECA provides the following comments in response to the current RFI.

## **Prioritize Turnover of School Buses That Do Not Comply with 2010 Emission Standards**

MECA encourages the EPA to continue to prioritize school bus fleet turnover through the retirement of model year 2010 and earlier school buses to ensure greater transportation and health equity for all school children.

According to a study published by the Health Effects Institute in 2024, only 67% of active school buses (total fleet estimated at ~480,000) in the United States were model year 2010 or newer<sup>1</sup>. This corresponds to potentially over 150,000 pre-2010 school buses that remain in service and lack the benefits of modern NOx and PM emission controls and as such pose greater health risks to school children.

MECA also highlights that 2027 compliant engines will soon become increasingly available to provide an additional 80% reduction in NOx emissions and 50% reduction in PM emissions beyond those of engines compliant with 2010 emission standards. The introduction of these ultra-low emissions engines should be included in Clean School Bus priorities.

In addition, given the significantly higher emissions and maintenance costs of pre-2010 engines, EPA should consider further ways to accelerate their turnover such as loosening mileage requirements to increase a fleets' ability to qualify under funding guidelines.

## **Recognize Retrofit and Alternative Fuel Engines and Conversions as Eligible Clean School Bus Technology**

EPA should include retrofit technologies and all alternate fuel powertrains and conversion technologies as eligible for Clean School Bus funding to expand program reach and accelerate program deployment. Such recognition should support a technology-neutral program that empowers school districts to choose cost-effective, locally appropriate solutions tailored for new and existing buses to reduce fuel costs and emissions. MECA believes that verified renewable fuels, including blends and dual-fuel options should also be incorporated into the program.

## **Establish an EPA-Approved Technology List for Retrofit and Alternative Fuel Systems**

EPA should renew a transparent, standardized list of verified retrofit technologies and create a new list of alternative fuel conversion systems, along with a formal process for manufacturers to submit technical data for evaluation. Clear eligibility guidance will reduce administrative uncertainty, support timely program implementation, and strengthen investment in U.S. manufacturing and workforce development. All technologies covered

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<sup>1</sup> Adar SD, Pedde M, Hirth R, Szpiro A. Assessing the National Health, Education, and Air Quality Benefits of the United States Environmental Protection Agency's School Bus Rebate Program: A Randomized Controlled Trial Design. Res Rep Health Eff Inst. 2024 Oct;2024(221):1-44. PMID: 39582384; PMCID: PMC11587696.

by the definition of “clean school bus” in 42 U.S.C. 16091(a)(3) should be considered and included.

### **Conclusion**

The U.S. EPA has been the world leader in the development of diverse performance-based programs to incentivize clean and fuel- efficient vehicles. The Clean School Bus program should continue this tradition by setting progressive performance-based policies that drive innovation and U.S. leadership in all areas of school bus transportation technologies and fleet management.

MECA will continue to support EPA’s Clean School Bus program and we reiterate our industry’s commitment to do its part to deliver cost-effective and durable advanced emission control technologies tailored to the safe and efficient transportation of students.

### **Contact:**

Dr. Rasto Brezny

Executive Director

Phone: 202-296-4797 x106

Email: [rbrezny@meca.org](mailto:rbrezny@meca.org)