

**Written Comments of the Manufacturers of Emission Controls Association
on the Washington Department of Ecology's Proposed Amendments to Chapter 173-423
WAC, Low Emission Vehicles, to Incorporate California's Clean Car Regulations**

November 14, 2012

The Manufacturers of Emission Controls Association (MECA) is pleased to provide comments in support of the Washington Department of Ecology's proposed amendments to its Clean Car Program, which would adopt the California ARB's new Low Emission Vehicle (LEV) III, greenhouse gas (GHG), and zero-emission vehicle (ZEV) standards for new motor vehicles and motor vehicle engines. These amendments, if adopted, will reset the bar for state-of-the-art exhaust and evaporative emission controls for light-duty vehicles through 2025. MECA applauds the Washington Department of Ecology for bringing forward a comprehensive set of proposals covering light-duty criteria pollutant emission standards and vehicle greenhouse gas emission standards for future vehicles.

MECA is a non-profit association of the world's leading manufacturers of emission control technology for mobile sources. Our members have over 40 years of experience and a proven track record in developing and manufacturing emission control technology for a wide variety of on-road and off-road vehicles and equipment, including extensive experience in developing exhaust and evaporative emission controls for gasoline and diesel light-duty vehicles in all world markets. A number of our members have extensive experience in the development, manufacture, and application of three-way catalyst technologies to help enable motor vehicles to meet existing LEV II and Tier 2 emission standards for new vehicles. Our industry has played an important role in the emission control success story associated with light-duty vehicles around the world, and has continually supported efforts to develop innovative, technology-forcing, emission control programs to deal with unique air quality problems.

MECA provided detailed written comments to ARB in January of this year (see: www.meca.org/galleries/default-file/MECA%20comments%20on%20ARB%20LEV%20III,%20post-2016%20GHG%20012512.pdf) as part of their proposed rulemaking for the Advanced Clean Cars program, which was officially approved by the ARB Board on January 27, 2012. In those comments, MECA agreed with ARB staff's assessment that achieving the proposed LEV III exhaust and evaporative emission standards and associated emission reductions are both technically feasible and cost-effective. This fact is clearly demonstrated by the more than two million SULEV- and PZEV-compliant light-duty vehicles that have been sold in the California market since these near-zero emission, gasoline vehicles were first introduced more than ten years ago. The technology base of advanced three-way catalysts, exhaust hydrocarbon adsorber materials, high cell density substrates, emission system thermal management strategies, secondary air injection systems, advanced carbon canisters, advanced low fuel permeation materials, and air intake hydrocarbon adsorber materials that have already been commercialized for PZEV gasoline vehicle applications can be extended to and further optimized to allow all light-, medium-, and heavy-duty gasoline vehicles to achieve the exhaust and evaporative emission reductions needed by vehicle manufacturers to comply with the LEV III emission limits.

In addition, advanced diesel emission control technologies, including diesel particulate filters, lean NOx adsorber catalysts, and selective catalytic reduction catalysts, will be combined with future, advanced diesel engines to allow light-duty diesel vehicles to achieve the LEV III emission limits.

MECA also fully supported ARB's post-2016 greenhouse gas emission standards for light-duty vehicles. Implicit in federal and state greenhouse gas emission analyses is the ability of these advanced powertrain options to meet the applicable criteria pollutant emission standards, such as for carbon monoxide (CO), oxides of nitrogen (NOx), and non-methane organic gases (NMOG). All of these advanced, light-duty powertrain options combined with the appropriately designed and optimized emission control technologies can meet all current and future federal and state criteria emission requirements. In this manner, advanced emission controls for criteria pollutants enable advanced powertrains to also be viable options for reducing greenhouse gas emissions. A range of powertrain technologies, including engine turbochargers, exhaust gas recirculation systems, advanced fuel systems, variable valve actuation technology, advanced transmissions, hybrid powertrain components, and powertrain control modules, that can be applied to both light-duty gasoline and diesel powertrains to help improve overall vehicle efficiencies, also help reduce fuel consumption, both of which can result in lower CO₂ exhaust emissions. In many cases, the application and optimization of advanced emission control technologies on advanced powertrains can be achieved with minimal impacts on overall fuel consumption. Auto manufacturers will also take advantage of synergies between advanced emission control technologies and advanced powertrains to assist in their efforts to optimize their performance with respect to both criteria pollutant and greenhouse gas emissions.

In summary, there are significant opportunities to reduce both criteria pollutant and greenhouse gas emissions from the transportation sector through the design of fuel-efficient powertrains that include advanced exhaust emission controls for meeting even the most stringent criteria pollutant standards that are included in the Washington Department of Ecology's proposed amendments to its Clean Car Program. MECA believes that advanced emission control systems have a critically important role in current and future policies that aim to reduce mobile source criteria pollutant and greenhouse gas emissions. These advanced exhaust and evaporative emission control technologies will allow all current and future high-efficiency powertrain options to comply with the Washington Department of Ecology's LEV criteria pollutant standards, thus enabling these powertrains to be viable options for complying with existing and proposed state greenhouse gas pollutant standards.

MECA commends the Washington Department of Ecology for taking important steps through its proposed amendments to its Clean Car Program to reduce criteria pollutant and greenhouse gas emissions and to improve fuel economy from light-duty vehicles in the state. Together, these new standards will provide consumers with the next generation of light-duty vehicles, designed to reduce multiple pollutants, while preserving vehicle choice and saving money. Our industry is prepared to do its part to deliver cost-effective, advanced emission control technologies to the marketplace.

CONTACT:

Joseph Kubsh

Executive Director

Manufacturers of Emission Controls Association

2020 North 14th Street

Suite 220

Arlington, VA 22201

Tel.: (202) 296-4797

E-mail: jkubsh@meca.org