



Manufacturers of Emission Controls Association
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August 21, 2014

Ms. Danielle Robinson
Air Resources Board
9528 Telstar Ave.
El Monte, CA 91731

Subject: MECA's Comments on ARB's Proposed Amendments to the Carl Moyer Program for On-Road Heavy-Duty Trucks

Dear Danielle:

MECA is pleased to provide written comments and recommendations to the Air Resources Board's proposed amendments to the Carl Moyer Memorial Air Quality Standards Attainment Program Guidelines for on-road heavy-duty trucks. MECA would like to thank ARB for its leadership in establishing incentive grant funding for the incremental cost of emission reduction technologies to be used towards achieving surplus emission reductions. MECA enthusiastically supports these guidelines that are focused on helping small fleets achieve early compliance in line with the latest revisions to the truck and bus regulations that were adopted by the Board on April 25, 2014.

At the April 24th Board hearing, the message from stakeholders was clear that the structure and qualification criteria of many state sponsored incentive programs has made it difficult for small fleets to qualify when competing for funding with large and medium sized fleets. It was also clear that many small fleets and owner operators were struggling to comply with the rule. MECA would like to provide a few recommendations aimed at reducing the risk to end users and air districts when public funds, such as Moyer, are applied towards the purchase of used trucks. The purchase of a new truck or VDECS comes with a manufacturer's warranty to insure that everything is new and operating properly and if something goes wrong within the warranty period, the manufacturer is required by law to cover the cost of repair or replacement of the defective parts. However, there is no specified warranty or assurance that engines or emission controls are functioning properly and have not been tampered when a previously owned truck is purchased. Because the maintenance history on used trucks is often unknown, the new owner may find out too late that the truck or OEM equipped emission control system has not been maintained properly. The new owner of a used truck would be required to make significant investments to repair or replace defective engine or emission control parts at a cost they were not budgeting for. They may not be able to make the investment since they just purchased a used truck expecting it to be in compliance. They may have no choice but to operate the truck in a state of disrepair. Continuing to operate a poorly maintained

truck or filter will not achieve the desired emission reductions intended by the Moyer program.

We ask that ARB consider including in the guidelines some simple and inexpensive provisions in the grant contract language in cases where Moyer funds are put towards purchasing a used truck. The guidelines should include a minimum dealer provided used truck warranty and a certificate that the engine and particulate filter have been inspected and serviced to return them to manufacturer specifications. A download of the engine control module would identify any recent fault codes that would need to be addressed. Furthermore, the general health of the engine and emission controls can be inspected using a simple opacity check. An engine-out opacity would indicate if there were any issues with injectors or oil burning by the engine. Inspection of the filter inlet for the presence of oil would identify any potential turbocharger problems associated with seals or bearings. Similarly a tailpipe opacity measurement would insure that the filter has not been tampered or damaged. Furthermore, it should be common practice that a used truck purchased with Moyer funds is sold with a filter that has been recently cleaned. Assurance that all original emission control components are present and functioning on the used truck should be provided by the dealer.

We would like to thank ARB staff for your consideration of our comments and for your efforts to amend the Moyer requirements to allow small fleets to receive incentive funds towards early compliance with the Truck and Bus regulation.

Best regards,

Rasto Brezny
Deputy Director

cc: Scott Rowland, ARB