

**STATEMENT
OF THE
MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION
ON THE U.S. ENVIRONMENTAL PROTECTION AGENCY'S NOTICE OF
PROPOSED RULEMAKING FOR THE CONTROL OF HAZARDOUS AIR
POLLUTANTS FROM MOBILE SOURCES**

**Docket ID No. EPA-HQ-OAR-2005-0036-0001
71 FR 15803 (2006)**

May 30, 2006

The Manufacturers of Emission Controls Association (MECA) is pleased to provide comments in support of the U.S. Environmental Protection Agency's (EPA) Notice of Proposed Rulemaking for the Control of Hazardous Air Pollutants from Mobile Sources.

MECA is a non-profit association made up of the world's leading manufacturers of emission control technology for on-road and off-road vehicles and engines, as well as stationary internal combustion engines. MECA's member companies have over 30 years of experience and a proven track record in developing and commercializing emission control technologies for a wide range of vehicles and engines. These companies have developed control technologies for gasoline, diesel, and alternative-fueled engines.

MECA supports the U.S. EPA's proposed rule to reduce hazardous air pollutants from mobile sources by lowering benzene content in gasoline; reducing exhaust emissions from passenger vehicles operated at cold temperatures; and reducing emissions that evaporate from, and permeate through, portable gasoline containers. However, MECA believes that the proposal should also consider reducing air toxic emissions from all nonroad, spark-ignited engines, implementing a more stringent light-duty gasoline aftermarket converter policy, and increasing the effectiveness of vehicle inspection and maintenance programs.

MECA believes that a significant opportunity exists to reduce mobile source air toxic emissions from all nonroad, spark-ignited engine categories, including marine engines, nonroad engines greater than 25 horsepower, recreational engines/vehicles, such as all-terrain vehicles (ATVs) and nonroad motorcycles, and non-handheld equipment (engines < 25 horsepower). These types of gasoline engines emit approximately 35 percent of all benzene and 1,3 butadiene pollution in the United States. The technology to reduce hydrocarbon emissions (including HC air toxics) from spark-ignited, nonroad engines is based on automotive-type three-way catalyst closed-loop technology. This technology has been used on well over 300,000,000 automobiles with outstanding results. Tens of millions of small displacement two-stroke and four-stroke, spark-ignited engines have already been safely equipped with catalysts in many world markets. These catalyst-equipped small engines include applications on handheld equipment (e.g., chainsaws, string trimmers, hedge trimmers), non-handheld equipment (e.g., lawn mowers sold in Europe, portable generators), and small displacement engines used on on-road motor scooters and motorcycles. Three-way catalysts have also been used effectively on thousands of large,



natural gas-fueled, reciprocating engines (so-called rich burn or stoichiometric natural gas engines) used for power production and pumping applications. These same catalyst technologies can be adapted to spark-ignited engines used in all nonroad mobile sources.

EPA staff is currently working on developing the next set of exhaust and evaporative emission standards for spark-ignited engines used in non-handheld equipment. MECA urges the agency to complete this rulemaking process as soon as possible and, at a minimum, harmonize emission standards for this class of engines with standards already in place in California for Class I and Class II nonroad engines. California has also recently adopted more stringent exhaust standards for larger, non-road spark-ignited engines (> 25 horsepower) starting in 2010 that are significantly lower than the EPA's 2007 standards (0.6 g/bhp-hr HC+NOx ARB exhaust emission limit in 2010 versus the 2.0 g/bhp-hr 2007 EPA standard). EPA should harmonize with California's 2010 standards for this class of non-road engines. EPA should also move quickly to harmonize with ARB's 2008 exhaust emission standards for sterndrive and in-board marine engines that will employ the use of proven three-way catalyst technology on these engines. Off-road motorcycles, snowmobiles, and ATVs emission standards can achieve exhaust emission levels on the order of 50% lower than the current EPA exhaust emission standards through the use of three-way catalysts on these nonroad engines. Further lowering of hydrocarbon exhaust emission standards for all of these nonroad, spark-ignited engines based on the use of proven three-way catalyst technology can provide additional significant reductions to toxic hydrocarbon emissions across the U.S.

In addition, MECA believes that the EPA proposal should also consider a light-duty gasoline aftermarket converter policy that sets higher performance and durability standards, i.e., a policy similar to ARB's interim policy requirements for aftermarket converters used on OBD-equipped vehicles. ARB intends to complete a rulemaking process in 2006 that will sunset the sale of older aftermarket converter products that have modest performance standards and a limited 25,000 mile warranty, and require that higher performance and more durable OBD-compliant aftermarket converter products be used on both non-OBD and OBD-equipped vehicles. These ARB-approved OBD-compliant aftermarket converters are warranted for 50,000 miles based on the use of a more aggressive, high temperature accelerated engine-aging protocol compared to the vehicle durability demonstration currently required by EPA for approved aftermarket converter products. With more than three million aftermarket converters sold per year across the U.S. (based on surveys completed by MECA with aftermarket converter manufacturers), significant additional reductions of hydrocarbon emissions, including toxic hydrocarbon emissions, and NOx emissions could be achieved with a national aftermarket converter policy that made use of the same higher performance OBD-compliant aftermarket converters available in California.

MECA also believes that increasing the effectiveness of existing vehicle inspection and maintenance (I/M) programs will help reduce mobile source air toxics. I/M programs help improve air quality in ozone non-attainment areas by identifying high-emitting vehicles in need of repair and fixing them. These high-emitting vehicles release unburned hydrocarbons (including HC air toxics), as well as carbon monoxide (CO) and nitrogen oxides (NOx). By

ensuring compliance with existing standards (through traditional tailpipe tests and newer OBD checks), additional significant reductions of mobile source air toxics can be achieved.

In conclusion, while MECA supports EPA's proposal to reduce mobile source air toxics, we believe that EPA can do even more to make the rulemaking more effective. Additional significant mobile source air toxic reductions can be achieved by promulgating tighter HC standards for nonroad, spark-ignited engines, implementing higher performance and durability standards for light-duty gasoline aftermarket converters, and increasing the effectiveness of existing I/M programs.

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