

Hi. My name is Antonio Santos. I am the Director, Special Projects, at the Manufacturers of Emission Controls Association. MECA appreciates the opportunity to provide comments on the OTC's development of an aftermarket converter model rule and comments in support of the OTC opposing any delay in implementation of the International Maritime Organization's Tier III NOx standards. MECA represents 46 manufacturers of emission control technology for mobile sources, including manufacturers of aftermarket catalytic converters and PM and NOx emission control technologies for marine engines.

As we noted in our written comments to OTC in June, MECA continues to believe that the most efficient way to achieve maximum emission reductions from the in-use light-duty fleet is through a revised federal aftermarket program. We have supported the OTC's efforts to push the U.S. EPA to act on a program that utilizes advanced converter technology with improved emissions performance and durability. MECA staff and member companies have also engaged in discussions with EPA directly over the past few years to try to revise the current interim aftermarket converter policy (originally issued back in 1986) to be more in line with California's comprehensive aftermarket converter program. An effective federal program will eliminate issues of enforcement on out-of-state vehicles and advanced aftermarket converter coverage for federally certified vehicles that are not covered by California Executive Orders. MECA has previously identified for OTC specific issues that individual states should take into account when deciding on whether to move forward with a revised aftermarket converter program and we thank OTC for taking these issues into consideration in developing its model rule.

MECA also supports OTC in opposing any delay in implementation of the IMO's Tier III NOx standards for large ships within Emission Controls Areas. Large marine diesel engines are significant contributors to air pollution in many cities, ports, and regions across the United States. The U.S. EPA anticipates that, over the next few decades, these engines may account for an even

greater share of overall emissions as tighter standards take effect for cars and trucks and other nonroad emission sources. The Tier III standards represent a 75% reduction in NOx emissions compared to current Tier II engines. Although the regulation is technology neutral, the regulation assumes that the standards will be met through the application of advanced emission control technologies such as selective catalytic reduction.

Marine engine manufacturers and emission control technology providers are already in position to meet these new more stringent standards on schedule. In fact, the decision by the IMO's Marine Environment Protection Committee in May to propose to delay implementation of the Tier III standards from 2016 to 2021 is reported to have been made despite an IMO correspondence group report which saw no need for a delay as it said the technologies needed to meet the tighter Tier III NOx standards are already available. Currently, SCR systems have been installed on more than 500 large ships around the world to reduce NOx emissions. A summary of this significant experience with installing SCR systems on large marine vessels will be included in a report currently being developed by The International Council on Clean Transportation that they plan to submit to the IMO later this fall which will challenge the arguments for delaying the Tier III NOx standards.

Thank you again for this opportunity to provide comments. MECA and its member companies look forward to working with OTC on these important issues.