

Oral Comments of the Manufacturers of Emission Controls Association
June 6, 2017
OTC/MANE-VU Spring Meeting
Saratoga Springs, NY

Good afternoon. I am Antonio Santos with the Manufacturers of Emission Controls Association. MECA is a national association of companies that manufacture a variety of exhaust emission control technologies, evaporative emission control technologies, and powertrain efficiency technologies for a range of mobile sources. We appreciate the opportunity today to provide comments in support of the proposed actions by OTC to urge the U.S. EPA to reduce emissions from in-use, light-duty gasoline vehicles and from future, heavy-duty on-road engines and locomotives.

MECA believes the most effective way to achieve maximum emission reductions from mobile sources in the short term is through cleaning up of the in-use vehicle fleet. Tier 3 light-duty standards will deliver long-term reductions, but a revised federal aftermarket converter program will deliver immediate benefits while the fleet turns over. MECA has worked in parallel with OTC to push EPA to upgrade their 1986 program to one that utilizes advanced converter technology with improved emissions performance and durability on par with California's requirements. As an alternative, MECA, AutoCare, and manufacturers have proposed a 49-state voluntary, industry-run certification program for aftermarket converters that would be administered and audited by an independent third-party. Such an approach offers an opportunity for states, EPA, and industry to combine resources to deliver a cost-effective policy for aftermarket converters that gives consumers less expensive alternatives to maintain their vehicles while reducing the risk of inferior products in the market. The HC+NO_x reductions from such a policy represents about 36 tons per day according to OTC's own analysis.

MECA believes the greatest opportunity to specifically reduce NO_x from mobile sources remains the heavy-duty sector. A recent MECA-sponsored MOVES analysis estimated a fully implemented heavy-duty NO_x reduction opportunity for the OTR of approximately 120 tons per day from on-road vehicles and 105 tons per day from off-road equipment. In a test program, MECA and ARB have demonstrated several technology pathways to significantly reduce NO_x from on-road heavy-duty engines with minimal impact on GHGs, which were published in April. A second demonstration will be completed by the end of next year. We believe that similar technology approaches can be applied to off-road heavy-duty equipment, including locomotives.

Finally, on a related note, MECA recently highlighted the need for future aftermarket converter standards and heavy-duty low NO_x standards in our written comments to EPA last month on regulatory reform.

We look forward to continuing to work with OTC and other stakeholders to push for effective EPA policies that will help states achieve their air quality goals.

Thank you.