Engine Manufacturers Association®

333 West Wacker Drive, Suite 810, Chicago, Illinois 60606
Tel: (312) 929-1970 | Fax: (312) 929-1975 | www.enginemanufacturers.org

October 13, 2010

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed Amendments to Airborne Toxic Control Measure for Stationary Compression-Ignition Engines

Members of the Board:

The Engine Manufacturers Association (EMA) is the trade association that represents the world's leading manufacturers of internal combustion engines used in a wide variety of applications, including on-highway trucks and buses, nonroad equipment, marine and locomotive applications, and stationary applications. EMA members manufacture and market the vast of majority of stationary compression-ignition engines sited and used throughout California.

EMA is writing to comment on the proposal that the Board is considering to amend the current Airborne Toxic Control Measure for Stationary Compression-Ignition Engines. EMA fully supports the proposed amendments and recommends that the Board approve the revisions to the ATCM that CARB staff have developed.

The proposed amendments revise the emission requirements for stationary emergency compression-ignition (CI) engines to align them with the corollary emissions standards promulgated by the US Environmental Protection Agency in the form of federal New Source Performance Standards (NSPS). The existing ATCM requires that all stationary emergency CI engines meet the EPA and CARB nonroad engine standards, including the upcoming Tier 4 emissions standards that would require the addition of exhaust aftertreament devices. The ATCM's aftertreatment-forcing requirement for emergency engines differs from the NSPS, since the NSPS do not require the addition of aftertreatment systems to stationary emergency CI engines in order to meet Tier 4 requirements.

In light of the significant difference between the ATCM and the NSPS, EMA approached ARB staff with a request to revise the ATCM to delete the requirement that stationary emergency CI engines be equipped with aftertreament systems. EMA's request was based on the following considerations:

- Aftertreatment is generally not effective on emergency engines since the engines typically do not run long enough to reach the operating temperature required to utilize catalyzed aftertreatment systems;

- The emissions from emergency engines are insignificant, and add only minimal amounts of emissions to the inventory since they operate on the order of only 30

hours per year. In light of that fact, many emission inventory calculations do not even include the emissions from emergency engines;

- The addition of aftertreatment devices can jeopardize the primary function of emergency engines which is coming up to power within seconds and operating at rigorous performance standards during times of genuine emergency;

- Aftertreatment systems can be large and space-consuming, which can require expensive modifications or redesigns to the site allocated for an emergency engine; and

- The addition of aftertreatment systems adds a very large cost to the price of emergency engines, without providing any cost-effective emissions reductions.

ARB staff agreed to consider EMA's request for alignment with the NSPS. As a result of their analysis, ARB staff determined that NOx aftertreatment would not be effective in reducing emissions from emergency engines, and also could not be justified when costs were considered -- conclusions that EPA also reached in establishing the relevant NSPS. In addition, ARB staff also found that there is very little benefit in requiring PM aftertreatment devices for emergency engines, since they operate so infrequently. Consequently, ARB staff is proposing to amend the ATCM's reference to the Tier 4 nonroad standards and to align the emissions requirements for stationary emergency CI engines with the corollary standards in the NSPS, except for a minor difference in the PM emissions standards for certain smaller engines.

EMA fully supports the changes detailed in the proposal before the Board. The proposed changes will have little or no impact on emissions, but will result in significant cost savings to owners and operators of stationary facilities throughout the state, including state and local government agencies, as well as hospitals and other vital service providers. Accordingly, the proposed amendments serve as excellent example of the ARB reviewing the requirements of an existing regulation and making appropriate changes that will result in a significant savings to the regulated community without undermining any programs to promote and attain clean air.

Finally, EMA would specifically like to commend the ARB staff for their prompt and diligent work on this project. Staff listened to EMA's rationale for the regulatory changes at issue, completed a thorough analysis of the proposed changes, and worked to develop the necessary supporting data and documents to revise the ATCM. EMA appreciates the efforts of staff in connection with this important issue.

Sincerely,

Timothy A. French
EMA General Counsel

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