



Advanced Emission Controls®

October 15, 2007

Dr. Alan Lloyd, Chair
ETAC
c/o California Air Resources Board
1001 I Street
Sacramento, CA 95812

Dear Chairman Lloyd:

Diesel engines emit significant amounts of particulate matter, much of which can be classified as black carbon. More and more scientific evidence suggests that black carbon plays an adverse role in climate change. While additional work remains to better understand and quantify the impacts, it seems prudent to look at additional ways to control this pollutant, especially since there are significant health based co-benefits.

We propose that the ETAC consider controlling diesel soot emissions by retrofitting diesel engines with CARB-verified particulate filters. As a starting point, the ARB has an existing health-based "Diesel Risk Reduction Program" that has led to a range of regulations. The ETAC could recommend an acceleration of these regulations that would allow those who take early action by installing CARB-verified particulate filters to obtain climate change credits. For example, California's electric and gas utilities are currently facing a CARB-rule requiring a significant reduction in emissions from their diesel engines. If the utilities were also given climate change credits for early actions, rule compliance could be accelerated, resulting in a positive impact on both human health and climate change.

We urge the committee to include reduction of black carbon as one of its early actions for fighting climate change. The basic framework is already in place in the terms of control technology and a regulatory framework. We are recommending additional incentives and/or credits be developed for early action to simultaneously address human health and climate change risks.

We are available to discuss this issue in more detail at your request.

Sincerely,

A handwritten signature in black ink that reads "Brad Edgar".

Brad Edgar, Ph.D.
Executive Vice-President and CTO
Cleaire Advanced Emission Controls

Cc: ETAC Committee members

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Page 2 of 2
