



Manufacturers of Emission Controls Association

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November 12, 2007

Dr. Alan Lloyd
Chair, ARB Global Warming Economic and Technology Advancement Advisory Committee
(ETAAC)
Sacramento, CA

Dear Alan and ETAAC Board Members:

The Manufacturers of Emission Controls Association (MECA) would like to add our voice to a recent letter sent to you and ETAAC in mid-October by one of our members, Cleaire Advanced Emission Controls. In his letter Dr. Brad Edgar, Cleaire's Chief Technology Officer, asked the Committee to consider putting climate change credits or incentives in place for reducing black carbon emissions from mobile sources. As you may be aware, the impacts of black carbon on global warming was the subject of a recent Congressional hearing held here in Washington on October 18, 2007 by the House Committee on Oversight and Government Reform, chaired by Congressman Henry Waxman of California. In this hearing, five noted experts (including three professors from California universities) provided testimony on the increasing scientific evidence that links climate change impacts with black carbon emissions associated largely with the combustion of diesel fuel in stationary and mobile sources. A video record of this hearing along with copies of the testimony from the expert panel is available at: <http://oversight.house.gov/story.asp?ID=1550>. The expert testimony indicated that carbon black emissions may be second only to carbon dioxide emissions in terms of their impacts on global warming.

ARB is already moving forward with an aggressive regulatory program to reduce diesel particulate emissions from mobile sources under the umbrella of the Diesel Risk Reduction Program that Dr. Lloyd put in place during his tenure as ARB Chair. In some cases, however, the implementation of these regulations on existing vehicles, engines, and equipment will extend through the end of the next decade.

As suggested by Dr. Edgar's letter to ETAAC, the potentially large co-benefit of PM reductions on climate change also provides an opportunity to accelerate the introduction of verified, Level 3 (> 85% PM reduction) diesel particulate filters on all diesel engine source categories operating in California. Fleet owners could be incentivized to act early in applying verified Level 3 retrofit filters, replacing existing highway, heavy-duty vehicles with new 2007-compliant heavy-duty engines equipped with diesel particulate filters, or replacing existing off-road diesel equipment with future Tier 4-compliant off-road engines equipped with diesel

particulate filters by providing these fleet owners with climate change credits that could be used to satisfy future California greenhouse gas emission requirements. This type of policy would provide accelerated co-benefits for climate change and public health for the citizens of California, and serve as a model policy for other states or the federal government to consider in moving forward with their own climate change policy decisions.

MECA is a non-profit association of the world's leading manufacturers of emission control technology for mobile sources. Our members have over 30 years of experience and a proven track record in developing and manufacturing emission control technology for a wide variety of diesel and gasoline on-road and off-road vehicles and equipment. Our members have invested and continue to invest significant resources in developing and verifying diesel retrofit technologies and, in emission control technologies for new "clean diesel" engines that provide substantial reductions in diesel particulate for both existing and future diesel engines that operate in California, including on-road, off-road, and stationary engines.

Incentive funds could also be made available to emission control manufacturers to help with the significant costs of retrofit technology verifications for reducing diesel PM emissions, particularly for smaller volume nonroad applications such as the agriculture, construction, mining, marine diesel or locomotive sectors. Retrofit verification incentives would also be helpful with more complex retrofit technologies that combine PM and NOx reductions for on-road or nonroad diesel engines (e.g., PM filters combined with NOx emission control technologies like SCR, NOx adsorbers, lean NOx catalysts or combinations of these).

Accelerating the pace of reducing diesel particulate emissions from existing diesel engines operating within California through the use of climate change credits, or providing retrofit verification grants would encourage continued investments by emission control manufacturers in technologies to reduce diesel PM emissions for all mobile and stationary source categories.

MECA urges ETAAC to strongly consider incentives and/or policies for reducing black carbon emissions from diesel engines within your discussions on activities or investments that will assist in the reduction of greenhouse gas emissions in California.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph E. Kubsh". The signature is written in a cursive, slightly slanted style.

Joseph Kubsh
Executive Director