



Manufacturers of Emission Controls Association

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Clerk of the Board
Air Resources Board
1001 I Street
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Subject: MECA's Comments on the 15-day Changes Proposal to the Truck and Bus Regulation

MECA is pleased to provide written comments to the 15-day changes proposed under ARB's amendments to the In-Use Truck and Bus Regulation that were adopted by the Board on April 25, 2014. MECA supports the proposed changes and we thank the ARB staff for including recommendations made by MECA and other stakeholders as part of this 15-day proposal. MECA and our members have had the opportunity to review the proposed 15-day changes and we believe that the modifications are consistent with the direction given by the Board during the hearing.

In particular we believe the changes made in clarifying the requirements to qualify for the Economic Hardship Extension go a long way to minimize the opportunities to abuse this extension and delay cleaning-up of older trucks. The reporting requirements, application requirements and responsibilities of the lending institution in certifying that sufficient information has been provided to support a loan denial help to tighten up the requirements to qualify for this extension. Furthermore, we thank ARB for including diesel retrofits as a compliance option under the Economic Hardship Extension. We continue to believe that VDECS are the most cost effective compliance options to reduce PM from older diesel vehicles.

MECA believes that the flexibilities that are being proposed to provide additional time for small fleets to comply are a positive step towards cleaning-up vehicles owned by small fleets and owner operators. These changes together with amendments being proposed to the Carl Moyer Program Guidelines will allow small fleets to qualify for funding that was previously unavailable to them. We hope that this will lead to higher compliance rates as well as surplus emission reductions.

Looking beyond the amendments to the Truck and Bus Rule, we believe that a robust heavy-duty inspection and maintenance program is an essential element of any clean air policy to

insure that engines and emission controls installed on heavy-duty trucks deliver the pollution reductions that they were designed for. This approach has been demonstrated for light-duty vehicles through state-wide Smog Check programs and can be just as effective on heavy-duty diesel vehicles. We are encouraged by the initiatives of ARB to develop preventative maintenance guidelines to help educate fleet owners in proper ways to take care of the new technologies being deployed on trucks. ARB and VDECS manufacturers have been engaged in education and outreach programs aimed at retrofit DPF equipped vehicles for years. Extending this to all filter equipped trucks is a good first step in educating end users in maintaining new technology diesel trucks.

In conjunction with this outreach campaign, we believe that ARB should develop a statewide mandatory annual inspection program for heavy-duty trucks, like the Smog Check program for light-duty vehicles, to insure that vehicles and control technologies are being properly maintained and continue functioning. One example of a proactive inspection program has recently been adopted by the Swiss government for filter equipped construction equipment. It consists of a bi-annual self-inspection by fleets using portable test equipment for all DPF retrofits installed on construction equipment. To our knowledge, this is the first example of a program, similar to California's Periodic Smoke Inspection Program (PSIP), being deployed on filter equipped vehicles. Previously, construction equipment owners in Switzerland were required to self-inspect their equipment using opacity as a maintenance criteria. With the introduction of DPFs, this was no longer feasible and the revised program utilizes more stringent emission limits based on particle number measurements and establishes in-use performance criteria consistent with the performance capabilities of wall flow diesel particulate filters. In response to these Swiss requirements, portable particle number counters have become affordable and are being deployed under the revised inspection and maintenance program.

MECA and our members are committed to providing technologies aimed at improving air quality in California and around the world. We look forward to working with ARB staff on achieving effective policy approaches to insure emission control technology performance towards achieving the pollution reduction goals of the Diesel Risk Reduction Program.

Joseph Kubsh
Executive Director
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