



Manufacturers of Emission Controls Association

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July 9, 2007

California Air Resources Board

Clerk of the Board

Sacramento, CA

Re: MECA comments on the proposed 2007 California State Implementation Plan

Dear Members of the Air Resources Board:

The June 14th and 22nd, 2007 Board hearings held on the San Joaquin Valley's 2007 Ozone Plan and the 2007 State Implementation Plan have focused attention on available strategies for cleaning up existing mobile sources that are a significant contributor to California's air quality problems. ARB's list of verified diesel emission control strategies (see: www.arb.ca.gov/diesel/verdev/vt/cvt.htm) already contains a large number of proven retrofit technology options for reducing particulate matter (PM) emissions from existing on-road diesel engines. Manufacturers are already beginning to respond to the need for reducing PM emissions from off-road diesel engines by verifying diesel particulate filter technologies for off-road equipment. A small number of retrofit options have also been verified for combined PM and oxides of nitrogen (NOx) reductions. The need for NOx reductions from existing diesel engines in states like California and Texas, however, has already begun to elevate the further development and investment in retrofit technologies that can provide PM and NOx reductions, such as combining a diesel particulate filter with selective catalytic reduction (SCR) technology for both on-road and off-road diesel engine applications. Combined filter + SCR retrofit technologies offer the potential for Level 3 PM reductions (> 85%) and NOx reductions of 70% or more for highway vehicles and off-road equipment. These combined PM + NOx retrofit technologies are already gaining experience on in-use diesel engines today.

The purpose of this letter is twofold. First, to make you aware of the resources available to you on the MECA diesel retrofit web site (www.dieselfetrofit.org) on diesel retrofit technology. My second purpose is to recommend that ARB continue its long leadership position on air quality policies by including strategies in the 2007 State Implementation Plan that not only take maximum advantage of available verified diesel retrofit technologies, but also provide incentives and market definition for retrofit technology developers to continue to invest in emerging retrofit technologies that will deliver both PM and NOx reductions for all of the diesel engines operating in California.

The Manufacturers of Emission Controls Association (MECA) is a non-profit association of the world's leading manufacturers of emission control technology for motor vehicles. A number of our members have extensive experience in the development, manufacture, and commercial application of PM and NOx emission control technologies for diesel engines. Our members have invested and continue to invest significant resources in developing and verifying diesel retrofit technologies for use on the whole

range of in-use diesel engines currently operating in California and the rest of the U.S., including on-road, off-road, and stationary sources.

Diesel engines are important power systems for on-road and off-road vehicles. These reliable and fuel-efficient engines drive many of the world's heavy-duty trucks, buses, construction vehicles, portable equipment, mining equipment, and agricultural equipment. Health experts recognize that PM and NOx are emitted from a variety of mobile sources, including diesel-powered vehicles and equipment. ARB and the U.S. EPA consider diesel emissions to be a public health concern and that emission reductions from all sources are needed to improve air quality.

California has a long history of adopting technology forcing standards that have provided technology developers with clear commercial targets for investing their research and development dollars. California's landmark Low Emission Vehicle I and II regulations are important success stories in your use of regulatory programs to drive technology innovation. These same clear policy signals are needed again from California to give manufacturers of retrofit technology the certainty that defined markets will develop for their products. These policy decisions not only include the identification of future strategies in your air quality plans, but also funding for demonstration programs that technology developers can use to develop the experience needed to move forward with the verification of retrofit technologies (especially for PM+NOx-based retrofit technologies applicable for both on-road and off-road applications) and aggressive regulatory programs (with clear statutory deadlines) that create market potential for both existing and emerging, verified retrofit technologies. An important step in this policy process is for the Board to approve the staff proposal on reducing PM and NOx emissions from in-use, off-road diesel equipment on July 26, 2007 without any delayed implementation, or reduced regulatory requirements.

MECA has been actively engaged with both ARB and EPA staffs on their verification protocols, including some of the recent proposals put forward by ARB on amendments to these procedures that impact the verification of technologies that include NOx reductions. The efficiency of ARB's verification process continues to be hampered by available staff resources assigned to this important task. MECA has asked ARB to provide additional trained staff for working the technology verification process to speed the delivery of retrofit technologies to the market (see for example, MECA's written comments submitted to ARB on the proposed regulations for in-use, off-road equipment or the oral testimony provided by MECA's Deputy Director, Dr. Rasto Brezny, at the May 25, 2007 hearing held in San Diego). A streamlined verification process that delivers proven retrofit technology to California should also be a priority for the Board. MECA asks for your help in providing the verification resources that are needed to deliver verified retrofit technologies to the California market.

I have attached for your information MECA's white paper on diesel retrofit technologies. This report describes the variety of technologies that are already available or under development to reduce both PM and NOx emissions from existing on-road and off-road diesel engines. MECA's diesel retrofit web site (www.dieselfetrofit.org) includes other useful information related to diesel retrofit emission control technology. The web site presents background information on the different types of diesel retrofit technologies, lists vendors of diesel retrofit products, provides links to various diesel retrofit programs/demonstration projects in the U.S., cites available funding opportunities, and makes available diesel retrofit-related fact sheets, white papers, and technical presentations.

Given the increased level of interest in diesel retrofit programs in California and throughout the U.S., I hope that you find the information contained in our retrofit technology report and on our web site helpful in moving forward with mobile source policies that continue California's long tradition of setting technology-forcing policies and standards that incentivize emission control manufacturers to commercialize retrofit solutions for reducing PM and NOx emissions from existing diesel engines.

MECA would be happy to organize in the near future a diesel retrofit technology briefing with interested Board members to discuss manufacturers' growing experience and continued development efforts on retrofit technologies that can reduce PM and NOx emissions from existing diesel-powered vehicles and equipment. Please contact me by phone or e-mail (jkubsh@meca.org) to schedule a briefing on this subject.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph E. Kubsh". The signature is fluid and cursive, with the first name "Joseph" and last name "Kubsh" being more legible than the middle initial "E.".

Dr. Joseph Kubsh
Executive Director, MECA