

**WRITTEN COMMENTS OF THE
MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION
ON THE U.S. ENVIRONMENTAL PROTECTION AGENCY'S NOTICE OF DATA
AVAILABILITY CONCERNING GREENHOUSE GAS EMISSIONS AND FUEL
EFFICIENCY STANDARDS FOR MEDIUM AND HEAVY-DUTY ENGINES AND
VEHICLES – PHASE 2
DOCKET ID NO. EPA-HQ-OAR-2014-0827-1469-A1**

March 30, 2016

The Manufacturers of Emission Controls Association (MECA) is pleased to provide comments in response to the U.S. EPA's request for public comments on their Notice of Data Availability covering the prohibition against tampering or disabling of emission controls on motor vehicles used for competition (Docket ID No. EPA-HQ-OAR-2014-0827-1469-A1). MECA supports the agencies position that the Clean Air Act expressly prohibits the tampering with the emission controls on certified motor vehicles that may be used for racing but may also find their way to occasional use on public roads.

MECA is a non-profit association of the world's leading manufacturers of emission control technology for motor vehicles. Our members have over 40 years of experience and a proven track record in developing and manufacturing emission control technology for the entire spectrum of internal combustion engines and mobile sources for gasoline, diesel, and alternative-fueled engines. A number of our members have extensive experience in the development, manufacture, and application of aftermarket emission control technologies for existing gasoline and heavy-duty engines to insure that emission controls originally certified on motor vehicles continue to operate beyond the vehicles emission warranty period.

To protect public health, as intended by the Clean Air Act, it is imperative that the emission control systems that were originally certified on motor vehicles remain on these vehicles over their full operating life even once the OEM emissions warranty expires. Some MECA members develop and manufacture aftermarket converters that are legal to replace a damaged OEM converter on a vehicle outside of the OEM emissions warranty. Over the past 40 years, catalytic converter technology has advanced significantly to where the exhaust exiting the tailpipe is 99% cleaner than that coming out of the engine.

Many states have implemented inspection and maintenance (I/M) programs to periodically inspect the emissions from passenger cars to insure that the emission controls continue to operate properly. There are many areas of the country that do not require I/M inspection and once a vehicle is sold, it may never be checked. The air quality is not confined to any particular area and pollution travels downwind to other parts of the country that may not benefit from up-wind clean air. Without I/M programs, emission controls may be tampered on a motor vehicle under the guise that the vehicle is used for racing. Such activity may be limited to weekends and the vehicle continues to operate on public roads during the week. Furthermore, there are manufacturers that offer exhaust modification kits for competition vehicles. Without an active I/M program there is no way to insure that these devices are not being misapplied to vehicles that may occasionally operate on public roads. Many of these purchases occur over the

internet so there is no way to insure that the vehicle that is being tampered is used solely for the purpose of racing competition and never driven on public roads. The California Air Resources Board requires aftermarket parts manufacturers to inform the installer of the legal and proper installation of their parts and to retain records of the owner and vehicle where the parts have been installed.

MECA members are avid car enthusiasts and many enjoy racing, however, our members believe that emission standards need to be enforced and emission controls should not be defeated. We support the EPA's long standing policy against tampering or disabling emission control systems on roadworthy passenger cars from their originally certified configuration. We also believe that the sale of devices that defeat emission control systems should be banned on competition racing vehicles that may be periodically operated on public roads. Thank you for consideration of our comments.

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