

Lisa Stegink

06-8-4

STATE OF CALIFORNIA
AIR RESOURCES BOARD

Notice of Public Hearing to Consider)
Technical Status and Proposed Revisions)
to Malfunction and Diagnostic System)
Requirements and Associated) **Hearing Date: September 28, 2006**
Enforcement Provisions for Passenger) **Agenda Item 06-8-4**
Cars, Light-Duty Trucks, and)
Medium-Duty Vehicles and Engines)
On-Board Diagnostic (OBD II) and)
Emission Warranty Regulation)

STATEMENT OF THE
ENGINE MANUFACTURERS ASSOCIATION

Good morning/afternoon. I am Lisa Stegink, speaking today on behalf of the Engine Manufacturers Association.

The OBD II Rule is highly technical and complex. Engine manufacturers have had extensive discussions with Staff over many aspects of the rule and the proposed amendments. Indeed, EMA and its members have provided continued input to Staff since the public workshop nearly a year ago.

All aspects of this rule will be difficult and challenging for engine manufacturers to meet. But, some aspects are not appropriate and should not be implemented. We are specifically asking the Board for relief on one narrow issue: the requirement to develop unique infrequent regeneration adjustment factors for the NMHC (or diesel oxidation) catalyst in 2008. EMA is asking the Board to postpone that requirement until 2010 for several reasons.

The first two are timing and workload. Manufacturers have finished their engine and OBD system designs for 2007 and are in the process of certifying those engine products. Those 2007 engines will be carried over into 2008 and 2009, until the next change of standards in 2010. Manufacturers already are deeply engaged in development of the engine and OBD technology necessary to meet the 2010 standards, and in meeting in-use program requirements. Adding unique IRAFs adds one more burden that would

further strain manufacturers' already limited resources. Even without any other work to do, 2008 is right around the corner, and there is not enough time to develop and validate new monitoring strategies for 2008. We agree that it is appropriate to look at and consider applying adjustment factors to account for the potential emission effects of infrequent regeneration events. But it is simply too late to require unique adjustment factors for 2008.

The third reason is need. Manufacturers have other systems in place that will help control emissions and turn on the MIL if a partially failed diesel oxidation catalyst does not properly regenerate. Those systems – developed as “backups” of a sort and to ensure performance – will help control emissions by turning on the MIL and making sure that engines get repaired. In other words, unique adjustment factors aren't necessary in 2008. ARB can wait until 2010 without putting the environment at risk.

The fourth reason is stringency. Adding adjustment factors to the calculations makes the OBD thresholds tougher to meet. OBD thresholds already have been set – and proposed – at the very limits of what ARB thinks – optimistically – that manufacturers can achieve. Only in the last few months – when the Staff and the industry raised the question for the first time – did anyone consider the impact of infrequent regeneration adjustment factors on the stringency of the OBD thresholds.

ARB should not impose this very narrow, unique requirement for diesel oxidation catalyst adjustment factors in 2008. We are asking for modest additional time until 2010, the next change in emission standards. Imposing on manufacturers the need to develop unique DOC infrequent regeneration adjustment factors for 2008 should not be done at this late date.

We ask that you direct Staff to postpone until 2010 the requirement to develop unique infrequent regeneration adjustment factors for the diesel oxidation catalyst.

I would be happy to answer any questions you may have. Thank you.