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Honorable Ron Miller
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Honorable Rep. Miller:

The Manufacturers of Emission Controls Association (MECA) would like to express its strongest support for the passage of House Bill 1699, the Dirty Diesel Demand Response bill. MECA represents 45 companies that develop and manufacture exhaust emission control technologies for on-road and off-road vehicles and stationary engines that operate in Pennsylvania and around the world. MECA member companies account for more than 65,000 jobs across the U.S. Some of our members have manufacturing operations and associated jobs in Pennsylvania for producing best available emission controls. MECA has been a strong supporter of air quality programs related to mobile and stationary internal combustion engines in North America for nearly 40 years.

Diesel vehicles and other diesel mobile sources have been equipped with the best available technologies for controlling diesel particulate and NO_x exhaust emissions for a number of years to comply with U.S. EPA emission standards. Diesel particulate filters (DPFs) have been equipped on nearly all new light-duty and heavy-duty highway diesel vehicles since 2007, and became available on some new off-road diesel engines starting in 2011. Selective catalytic reduction (SCR) technology debuted on heavy-duty highway diesel vehicles starting in 2010 and is now available on nearly all new heavy-duty highway diesel trucks and buses. All new light-duty diesel vehicles sold in the U.S. also are equipped with SCR systems for controlling NO_x emissions from these clean diesel vehicles. Some new off-road diesel engines were equipped with SCR systems starting in 2011 and many more new off-road diesel engines will feature SCR technology for reducing NO_x starting in 2014. New stationary internal combustion engines used in non-emergency generators will begin to benefit from clean diesel technology such as diesel particulate filters for controlling PM emissions and selective catalytic reduction technology to reduce ozone forming NO_x emissions in 2015 as a result of EPA's New Source Performance Standards. SCR technology has been used on stationary engines since the 1980s and is the best technology available for reducing NO_x emissions by over 90% from engine-out emission levels. As mobile sources get cleaned-up by tighter

emission standards, pollution from stationary engines will become a more important contributor to the particulate and NOx emissions inventory in Pennsylvania.

MECA supported the original EPA RICE NESHAP regulations governing the control of hazardous air pollutants (HAPs) from stationary CI and SI engines. Many emergency engines can be used to supply power during periods of high energy demand or peak shaving and can be registered with utility companies as available for emergency demand response programs. For both of these functions the operators are well compensated financially which helps to offset the cost of the engines. Emergency engines were originally exempted from the NESHAP requirements for up to 15 hours of demand response operation. Most demand response programs require at least a 60 hour/year commitment of availability in order to qualify for the program. The 2012 amendments to the RICE NESHAP regulation extended the allowable time for stand-by engines to be used for emergency demand response from 15 to 100 hours thus allowing all of these engines to qualify for demand response programs without the need to employ pollution controls. MECA members experience has shown that most demand response engines operate in the range of 25-100 hours per year and that demand response programs are a lucrative way to pay for emergency stand-by engines that are otherwise just sitting idle for most of the year.

I would like to close by again emphasizing MECA's strong support for the passage of House Bill 1699. The bottom line is that if engines are emitting pollution for the purpose of financial gain than a portion of that compensation should be reinvested into pollution controls to remediate those emissions.

Sincerely,



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