Message

From: Brian C Mormino [brian.c.mormino@cummins.com]
Sent: 6/14/2018 2:51:30 PM
To: Wheeler, Andrew [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=17a1669ef5b54fba8cb457845308787e-Wheeler, An]
Subject: Nationwide HDOH Low NOx Rule
Attachments: EMANOxHandout12.17.pdf

Dear Deputy Administrator Wheeler:

As discussed, our goal is to create a more effective and efficient national heavy-duty emissions program that will significantly reduce real world NOx emissions.

The Truck and Engine Manufacturers Association (EMA) submitted comments on various regulatory reform options. Below is a summary of the key elements that could be reformed as part of a national heavy-duty on-highway low NOx regulation. Additionally, attached is a document that EMA provided to Assistant Administrator Wehrum in December 2017.

Please let me know if you need any additional information,

Brian

Priorities for Regulatory Reform in a Streamlined Nationwide HDOH Low NOx Rule

There are a number of opportunities for regulatory streamlining and reform, including the following:

- **On-board diagnostic (OBD) requirements.** CARB's OBD requirements are overly complex and expensive, costing each manufacturer more than $25 million per year (which is a significant percentage of each engine manufacturer's annual R&D budget). The OBD requirements could be streamlined by EPA as they only need to cover basic diagnostics to ensure the functionality of key emission-control system components.
- **Manufacturer-run heavy-duty in-use testing (HDIUT).** The current program is expensive, inefficient, and not well-suited to the assessment of real-world emissions exceedances. As EPA develops new low-NOx regulations, it has the opportunity to develop more cost-effective means of assuring real-world compliance and eliminate the HDIUT regulations.
- **Production Line Testing and Selective Enforcement Audits.** These programs are no longer needed and the expense associated with them can be reduced or eliminated.
- **Deterioration Factor (DF) Testing.** This testing, aimed at establishing emission levels at the end of an engine's useful life, is exceedingly time consuming (in months), resource intensive (test cells and test engineers) and expensive (in millions of dollars). Streamlined requirements incorporating accelerated aging methods are necessary in lieu of current DF requirements.
- **"Carry-over" engine family certification.** Eliminate the need for expensive and unnecessary annual re-certification of engine families (where the underlying technology has not changed from one model year to the next).
- **Phase 2 GHG regulations.** The HDOH industry generally supports the GHG Rule and opposes wholesale changes. However, certain requirements can be eliminated, including the annual chassis-dynamometer testing of five HDOH vehicles, duplicative and costly aerodynamic "coastdown" tests, and burdensome GHG-credit reporting requirements.