



Gina McCarthy, Administrator
U.S. Environmental Protection Agency
Mail Code: 2822T
1301 Constitution Ave. N.W., Washington, DC 20460

Re: Updating the Federal Aftermarket Catalytic Converter Policy

Dear Administrator McCarthy:

The Ozone Transport Commission (OTC) calls on the Environmental Protection Agency (EPA) to prioritize an update to the federal Aftermarket Catalytic Converter policy in FY15.

The current federal policy for aftermarket catalytic converters (“AMCC Policy”) was published on August 5, 1986 (Notice of Proposed Enforcement Policy regarding the "Sale and Use of Aftermarket Catalytic Converters," 51FR 28114) and has not been updated to reflect the significant changes in automotive technologies and vehicle emission standards. The OTC states requested that EPA update the AMCC Policy in 2009 and submitted a recommendation for an updated policy to EPA in 2011.

Based on OTC’s technical analysis, updating the AMCC Policy to include current technology and standards would reduce emissions of oxides of nitrogen by up to 30 tons per day in the OTC member states. The emissions reductions from an updated AMCC Policy would be even greater in the upwind states which are necessary for states in the Ozone Transport Region to attain the 75ppb ozone standard.

Updating the AMCC Policy will help reduce emissions from the legacy vehicle fleet and assist states to meet the ozone health standard. The OTC completed a model rule for states to utilize due to lack of federal action. Industry stakeholders have raised concerns of a “patchwork” of state rules. This “patchwork” can be avoided with federal action.

The OTC would be happy to answer questions regarding current AMCC technology and emissions reductions expected from an updated AMCC Policy. EPA is taking several actions to address ozone pollution (e.g., a new transport rule, a rule to implement the 75 ppb ozone standard, and development of a new ozone standard). Updating the AMCC Policy would be a useful addition to EPA’s current efforts to address ozone.

Sincerely,

/s/

Robert Summers
Ozone Transport Commission Chair

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District of Columbia

Maine

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