
Senate Committee on Environment and Natural Resources
900 Court St. NE
Salem, Oregon 97301

Re: Comments on SB 1008

Chair Dembrow and Members of the Senate Committee on Environment and Natural Resources,

ESW Group appreciates the opportunity to comment on SB 1008 and the importance of addressing air pollution from in-use diesel engines. ESW Group is a US-based company with long history of diesel emission control expertise. As owner of nine California Air Resources Board (CARB) retrofit diesel emission control strategy verifications, we are quite familiar with technical and logistical elements of diesel emission control regulations. The company started retrofitting vehicles in 2004 and have assisted public and private fleets with nearly 20,000 retrofit systems since then to comply with California regulations or various incentive programs.

Based on our 15 year experience with diesel emission control technology and regulation, we believe that the initial version of SB 1008 would have produced significant air quality benefits for communities in Oregon.

We are therefore dismayed to hear that the bill has been stripped of some of its key components. This is disappointing for several reasons:

- the negative health impacts of dangerous ultrafine particulates are known,
- technology to reduce diesel particulate emissions are mature and products labelled “verified” have been rigorously scrutinized by CARB and/or the U.S. EPA,
- similar regulation has been a very successful and supported by key stakeholders such as the trucking industry in California

We urge Oregon legislators to extend the retrofit and replacement deadline for school buses. The extension of this deadline would allow school districts to upgrade their vehicles in a cost effective way and make sure children are not exposed to the uncontrolled emissions of dangerous ultrafine diesel particulate matter.

We are also concerned that the bill may no longer restrict the influx and operation of used noncompliant California vehicles. The import and operation of such “dirty” vehicles will be a setback in Oregon’s clean air efforts. As the experience in California has shown, most of these vehicles can be retrofitted and be made compliant with US 2007 PM emission standards at an installed cost of approximately \$8,000 to \$13,000 (depending on the system, engine size and application). The required maintenance on a retrofit system is roughly equivalent to that of the emission control system on a model year 2007-2009 engine, and is less complicated than a 2010 and newer engine (which requires regular addition of diesel exhaust fluid, a.k.a. DEF or urea).

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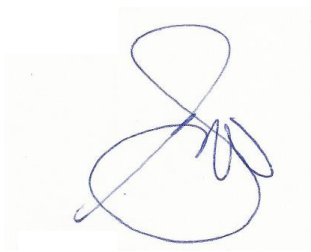
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Diesel retrofits provide a highly cost effective option to those who don't have the resources to replace a truck or bus. While fleet rejuvenation or switching to alternatively-fuelled vehicles requires significant capital investment, diesel retrofits provide similar PM reductions at a fraction of the cost. A recently released report on the cost-effectiveness of emission reduction programs identified diesel retrofits as one of the two most cost effective ways to reduce mobile sources of emissions (reference 1).

Please support moving SB 1008 forward with the –A3 amendments which strengthen the bill and take important steps to improve air quality for Oregon's school children and citizens as a whole.

Sincerely,



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References

1. "Congestion Mitigation and Air Quality (CMAQ) Improvement Program Cost-Effectiveness Tables Development and Methodology," Office of Planning, Environment, & Realty (HEP), Federal Highway Administration, U.S. Department of Transportation, https://www.fhwa.dot.gov/environment/air_quality/cmaq/reference/cost_effectiveness_tables/report/costeff01.cfm
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