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## STATEMENT OF THE OZONE TRANSPORT COMMISSION CALLING ON THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY TO ACHIEVE ADDITIONAL EMISSION REDUCTIONS FROM ACTIVITIES RELATED TO GOODS MOVEMENT AT PORTS

The Ozone Transport Commission (OTC) states call on the United States Environmental Protection Agency (EPA) to develop measures that will further reduce emissions from sources involved in transporting goods to and from our region's maritime ports. Air quality modeling and emission inventory calculations indicate that mobile sources, including those involved with goods movement, are the largest anthropogenic contributor to high ozone levels in the region and in the eastern U.S. In addition, residents in some parts of the Ozone Transport Region (OTR) continue to be exposed to some of the unhealthiest air in the country. Twelve areas with a population of 40 million people remain in nonattainment of the 2008 health based standard of 75 parts per billion for ozone, while several areas continue to measure ozone levels above the 1997 85 ppb ozone standard. Furthermore, a slightly larger population of the OTR is expected to be in nonattainment for the 2015 health based standard of 70 parts per billion. Thus, further reductions in ozone forming pollutants are needed quickly.

The EPA's Mobile Source Technical Review Subcommittee (MSTRS) provides the Clean Air Act Advisory Committee (CAAAC) with independent advice, counsel and recommendations on the scientific and technical aspects of programs related to mobile source air pollution and motor fuels. Through its various workgroups, the Subcommittee addresses a wide range of developments, issues and research areas such as emissions modeling, air toxics, innovative and incentive based transportation policies, on-board diagnostics, heavy-duty engines and reformulated gasoline.

In 2014, the EPA charged the MSTRS with developing recommendations for an EPA led voluntary environmental port initiative, along with suggestions on how to effectively measure air quality and greenhouse gas performance of ports and/or terminals within ports. As part of the charge, the EPA asked the Subcommittee to consider: past Subcommittee and other related recommendations; existing port environmental improvement programs; ports in the context of the broader transportation supply chain; and information from the EPA's emission assessments of various ports, as available. The Subcommittee is expected to make its recommendation to the EPA in early 2016.

As EPA evaluates and determines its course of action in response to the anticipated ports recommendation from the MSTRS, the OTC and MANE-VU states call on the EPA to:

a) Identify opportunities and implement measures providing additional oxides of nitrogen (NOx) and diesel particulate matter emission reductions, in particular reductions that can be included in State Implementation Plans (SIPs), from activities related to goods movement at and in the vicinity of maritime ports and develop enhancement to accelerate fleet turnover;

- b) Increase emphasis of the SmartWay® program on drayage trucks; and
- c) Work with its state and local air pollution control agencies and other relevant agencies to develop, for each port, as needed, clean air goals, implementation strategies, measures, and a pathway for inclusion in a SIP to assist in attaining and maintaining the air quality goals in a reasonable time frame.

The OTC states continue their commitment to work with EPA to develop methods to quantify additional NOx and volatile organic compound (VOC) emission reductions that could be associated with the efforts to increase participation in the SmartWay® program by carriers transporting goods in the OTR (November 19, 2014 Statement).

Adapted by the Commission on November 5, 2015.

Jared/Snyder

OTC Chair