

OTC Stakeholder Meeting

September 20th, 2016

Washington, DC

Mobile Source Committee Update



Committee Charge

- Goal: To identify potential strategies for consideration at the 2016 Fall Meeting
- Strategies Include:
 - Sectors of High Emission Reduction Potential
 - Heavy Duty Diesel Trucks
 - Passenger Vehicles
 - Movement of Goods
 - Construction Equipment
 - Pleasure craft
 - Ports
 - SmartWay
 - Diesel I/M & SIP Credit
 - VMT Strategies
 - Additional Transportation Strategies

Why Aftermarket Converter?

Cars and trucks remain on the road longer than before

- Slower emission benefit from fleet turnover
- Failure rate of original converter increases over time

When warranties end, aftermarket parts are important

- OEM converters are expensive
- Aftermarket parts are more affordable option



Cleaner aftermarket converters provide mobile emission reductions without need for fleet turnover

OTC analysis estimates the following benefits from an improved aftermarket program in the OTR:

	NO _x	NMHC	CO
Annual (tpy)	10,000	2,000	27,000
Daily (tpd)	30	6	74

Aftermarket: EPA's Policy Status

OECA (EPA's enforcement division) is in the process of ending the 1986 federal aftermarket converter enforcement policy



EPA would revert to the 1974 Interim Tampering Enforcement Policy “Memo 1A”

- Assumes that aftermarket parts designed to replace OEM equipment don't ever adversely affect emissions
- No specific requirements or standards for aftermarket

OTC is concerned that:

- OECA will not enforce the 1974 Interim Tampering Enforcement Policy; and
- Only expensive OEM and CARB aftermarket converters would be legal so compliance will decrease; or
- There would be no aftermarket standards so a race to the bottom among manufacturers would result

Aftermarket: Comparison of Options

Option	Challenges
1. Status Quo	Does not result in technologically acceptable emission reductions
2. 1974 Interim Policy	Enforcement becomes harder, would not likely result in acceptable emission reductions and potentially lead to emission increases, race to the bottom
3. OTC Recommended Federal Update	EPA must act and might not have the authority to do as they did in 1986
4. OTC Model Rule/CARB	Heavy reliance on CARB certification, interstate sale issues, not good option for 49 state vehicles
5. Voluntary Program	Emission reductions less guaranteed, SIP credit more challenging

Maritime Ports

EPA asked MSTRS Port Workgroup for recommendations on:

- An EPA-led voluntary environmental port initiative
- How to effectively measure air quality and GHG performance of ports and/or terminals within ports

Final recommendation expected Fall 2016

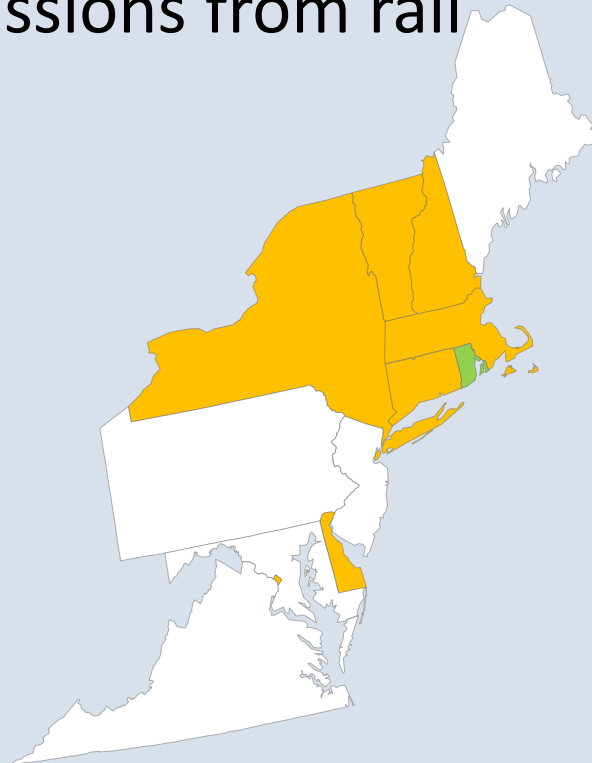
MSC will use the recommendations as an important tool in further OTC specific ports work



Reducing Emissions from the HD Sector

SCAQMD petitioned EPA for better NO_x standards from HD sector on June 3, 2016

- Several OTC members (see map below) signed on
- San Joaquin APCD petitioned EPA on June 22nd and also called for reduced emissions from rail



Reducing Emissions from the HD Sector

Heavy Duty GHG Rule finalized on August 16, 2016

- No specific NO_x reductions required in the final rule
 - Some co-benefits from increased APU penetration cited
- Preamble responded to need for further work to reduce NO_x emissions and cited:
 - OTC and other RPO Comments
 - SCAQMD petition



Reducing Emissions from the HD Sector

Still monitoring progress on Southwest Research Institute (SWRI) low emission HDE study

- SWRI is studying various technologies that could achieve ultra low emissions in HD trucks
- Expect results towards end of 2016



Technical Support Documents

Finalization of TSD for 2010-2014 OTC model rules underway

Two model rules completed by MSC included in the TSD

- Nonroad Idling
- Aftermarket Converters

TSD is available on OTC website for public review

Questions

