

**Testimony of  
Chris N. Salmi  
on behalf of the  
The Ozone Transport Commission  
before the  
U.S. Environmental Protection Agency  
on the  
July 8th, 2009  
Proposed Rule to Control Emissions from New Marine Compression-Ignition Engines  
at or Above 30 Liters per Cylinder  
(Federal Register: Vol. 76, No. 126, Page 32479-32480)  
Docket No. EPA-HQ-OAR-2007-0121**

**August 4, 2009**

Good morning and thank you for the opportunity to comment on the EPA proposal to revise its regulations to control the emissions from new marine compression-ignition engines at or above 30 liters per cylinder or C3 marine engines. I am Chris Salmi, the Chair of the Ozone Transport Commission Mobile Source Committee. I am also the Assistant Director of the Division of Air Quality in the New Jersey Department of Environmental Protection. I am here today to testify on behalf of the Ozone Transport Commission (OTC). The Ozone Transport Commission was created by Congress under the Clean Air Act Amendments of 1990 to coordinate among its members and develop and recommend emission reduction strategies to attain the ozone National Ambient Air Quality Standards in the Northeast and Mid-Atlantic region of the United States. Members of the Ozone Transport Commission include the states of: Connecticut, Delaware, Maine, Maryland, New Hampshire, New Jersey, New York, Massachusetts, Pennsylvania, Rhode Island, Virginia, and Vermont, and the District of Columbia.

Many areas in the Ozone Transport Region currently do not meet the federal health standards for ozone and fine particulate matter. Many of these areas are or are expected to be designated as nonattainment areas by the EPA. Attaining and maintaining these standards presents a significant challenge for the states.

For the states to achieve the clean air goals, strong national regulations are needed in addition to local and regional measures. In the case of the C3 marine vessel engines, strong international regulations are also needed. The Ozone Transport Commission members wish to express their support for the EPA's efforts in establishing tighter international emission regulations before the International Maritime Organization. The Ozone Transport Commission members also support the efforts by the EPA to establish Emission Control Areas (ECAs) along our coastlines.

The Ozone Transport Commission members urge the EPA to develop and implement national regulations in other categories including: electric generating units; industrial, commercial and institutional boilers; architectural and industrial maintenance coatings; consumer products; and for vehicle and equipment engines.

With regard to the specific proposal, the Ozone Transport Commission members offer the following comments:

Beginning in 2011, the EPA is requiring newly built engines to incorporate NOx reducing technologies such as engine timing, engine cooling and advanced computer controls. This will result in a 15 to 25% reduction in oxides of nitrogen from engines in this category. EPA should examine the availability of similar technologies as retrofits to the existing fleet.

The proposal also indicates Selective Catalytic Reduction (SCR) technology would be required on all new Category 3 engines built after 2016 and that it would be required to achieve an 80% NOx reduction. The EPA documentation shows that greater than an 80% reduction is achievable and demonstrated. The EPA should consider greater emission reductions and require it as expeditiously as practicable.

In addition to the proposed reductions for fuel sulfur, the Ozone Transport Commission members would prefer the EPA also establish particulate matter emission standards, but understand the need for data gathering proposed in the

regulation. We urge the EPA to establish particulate matter emission standards as the data becomes available.

Analysis by the EPA indicates significant emission reductions and air quality benefits would occur by establishing these national Category 3 marine engine standards. By 2030, annual particulate matter emissions would decrease by about 143,000 tons per year and NO<sub>x</sub> emissions would decrease by 1.2 million tons per year. These reductions would have a positive impact on air quality and the quality of life for millions of people living in coastal areas. The EPA's regulatory impact analysis shows monetized health benefits of this proposal outweigh the cost by at least 30:1. This statistic is phenomenal! The Ozone Transport Commission members encourage the EPA to evaluate additional methods including: near term compliance deadlines, retrofit controls, and faster turnover of the existing fleet so that air quality benefits may accrue in a more expeditious manner.

Finally, the Ozone Transport Commission members offer to assist the EPA and other regional organizations to examine additional regional marine port strategies, specifically, the Mobile Source Committee will be examining other strategies associated with operations at the ports, including ways to reduce emissions from: the terminal operations, the trucks supporting the ports, as well as the ships calling on the ports. Such strategies have the potential to achieve further emission reductions and improve the quality of life for millions of people in the Ozone Transport Region.

Thank you for the opportunity to provide testimony today and we look forward to continuing to work with EPA to protect the health of our citizens.