



December 30, 2014

Administrator Gina McCarthy  
United States Environmental Protection Agency  
Air and Radiation Docket and Information Center  
1301 Constitution Ave. N.W., Washington, DC 20460  
Mail Code: 2822T.

Re: Statement of the Ozone Transport Commission Calling on the United States Environmental Protection Agency to Improve and Quantify the Effectiveness of the SmartWay® Program in the Ozone Transport Region.

Dear Administrator McCarthy:

The Ozone Transport Commission (OTC or Commission) is the multi-state organization created and charged under the Clean Air Act (CAA) to advise the U.S. Environmental Protection Agency (EPA) on practical and cost effective solutions to the environmental and public health problem of ground-level ozone transport that negatively impacts the Northeast and Mid-Atlantic regions. Attached is a statement adopted by the OTC at the 2014 Fall Meeting held on November 19, 2014, with a request to better engage EPA to improve and quantify the benefits in the SmartWay® program for needed emission reductions by the states in the OTR.

Ozone remains a significant health threat and according to recent EPA and OTC analysis, mobile sources are the largest anthropogenic contributors to elevated ozone levels in the Ozone Transport Region (OTR). Projected mobile source emissions demonstrate that heavy-duty diesel emissions are persistent and likely to be the largest source of mobile NOx emissions by 2020 in the OTR. The Commission believes the SmartWay® Program can be an effective means to reduce NOx emission from heavy-duty diesel emissions.

If you or your staff have any questions regarding the issues raised in this letter or the statement, please contact David Foerter, OTC's Executive Director at (202-508-3840).

Sincerely,

David Foerter  
Executive Director

cc: OTC Air Directors

Janet McCabe, Acting Assistant Administrator EPA OAR  
Chris Grundler, Director EPA OTAQ

Connecticut

Delaware

District of Columbia

Maine

Maryland

Massachusetts

New Hampshire

New Jersey

New York

Pennsylvania

Rhode Island

Vermont

Virginia

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## OZONE TRANSPORT COMMISSION

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### Statement of the Ozone Transport Commission Calling on the United States Environmental Protection Agency to Improve the Effectiveness of the SmartWay® Program in the Ozone Transport Region

The Ozone Transport Commission (OTC) states call on the U.S. Environmental Protection Agency (EPA) to support the OTC in seeking additional emission reductions through increased participation in the Agency's SmartWay® program along the heavily travelled corridors (e.g. I-95, I-76) in the Ozone Transport Region (OTR). These highway corridors are major thoroughfares for the movement of goods via trucks and emissions from heavy duty truck traffic adversely impact the quality of air.

Residents in some parts of the 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 (ppb) for ozone, while several areas continue to violate the 1997 84 ppb ozone National Ambient Air Quality Standard. Further reductions in ozone forming pollutants (i.e., Oxides of Nitrogen (NO<sub>x</sub>) and Volatile Organic Compounds (VOCs)) are needed quickly.


According to recent EPA and OTC modeling, mobile sources are the largest anthropogenic contributors to elevated ozone levels in the OTR. The projected mobile source emission inventory demonstrates that heavy-duty diesel emissions are likely to be the largest source of mobile NO<sub>x</sub> emissions in 2020 in the OTR.

The SmartWay® Program is a voluntary partnership among EPA, trucking companies, rail carriers, logistics companies, commercial manufacturers, retailers, and other federal and state agencies. It aims to reduce emissions from goods movement supply chains by creating incentives for the SmartWay® participants to improve fuel efficiency.

The OTC calls on the EPA to:

- Encourage companies involved with the movement of goods in the OTR to increase participation in the SmartWay® program, improve performance, and thus potentially decrease NO<sub>x</sub> and VOC emissions; and
- Work together with the OTC States to collect data and develop methods to quantify additional NO<sub>x</sub> and VOC emission reductions that could be associated with the effort to increase participation in the SmartWay® program by carriers transporting goods in the OTR.

Adopted by the Commission on November 19, 2014

  
Jane Herndon