



**STATEMENT OF THE OZONE TRANSPORT COMMISSION
REQUESTING THAT THE UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY ASSIST THE STATES BY IMPLEMENTING
EMISSION REDUCTION PROGRAMS TO REDUCE NO_x EMISSIONS
FROM HIGH PRIORITY MOBILE SOURCES**

Connecticut

Delaware

District of Columbia

Maine

Maryland

Massachusetts

New Hampshire

New Jersey

New York

Pennsylvania

Rhode Island

Vermont

Virginia

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A substantial number of residents in the Ozone Transport Region (OTR) continue to be exposed to some of the unhealthiest air in the country. Many areas of OTR are expected to be in nonattainment for the 2015 health-based standard of 70 parts per billion and face continued challenges meeting the 2008 health-based standard of 75 parts per billion. Some of these areas will likely be designated with a moderate classification under the 2015 standard and need enforceable emission reductions by 2023, so further actions and reductions in ozone forming pollutants are needed quickly.

Scientific analysis has shown that widespread regional reductions of oxides of nitrogen (NO_x) are needed to reduce regional ozone pollution. OTC research shows that currently on- and off-road mobile sources will be responsible for approximately 55% of the NO_x emissions east of the Mississippi, making mobile sources the largest producer of NO_x emissions in the inventory. In areas with persistent ozone nonattainment, our modeling and EPA modeling shows that on- and off-road mobile sources will be responsible for about two thirds of the ozone impacting the OTR, as well as in other areas outside of the OTR, including Sheboygan WI, Atlanta GA, Louisville KY and Holland MI.

Emission inventory calculations for 2011 indicate that heavy-duty trucks were already the largest emitter and locomotive engines were the 6th largest emitter of anthropogenic NO_x for the states east of the Mississippi. By 2018, heavy-duty trucks are projected to remain the largest emitter of NO_x and locomotive engines will move to become the 4th largest emitter. These two categories have some of the greatest potential for reductions of NO_x emissions moving forward, yet federal emission standards for heavy-duty onroad vehicles have not been tightened since 2000 and locomotive engines since 2008.

The OTC cannot achieve these reductions on their own due to the preemption in the Clean Air Act of individual states setting mobile source standards, and the broad geographic application of the emission reduction programs. It is vital for EPA to work with states as a strong federal partner using cooperative federalism as the backbone to pursue efforts to reduce emissions from heavy-duty onroad vehicles and locomotive engines.

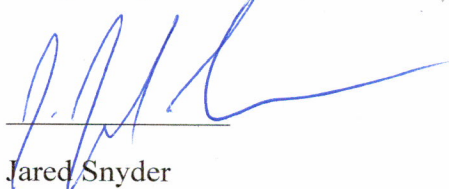
On June 3, 2016 the South Coast Air Quality Management District submitted a petition to EPA calling for ultra-low NO_x emission standards while providing the technical backing for stricter emission levels. Since then eight OTC members have signed onto that petition. Additionally, research conducted by the Southwest Research Institute demonstrated that commercially available technologies currently exist to meet NO_x emission standards of 0.04 grams per brake horsepower-hour in heavy-duty

diesel onroad vehicles and have the potential to meet lower emission levels. Natural gas technologies have also demonstrated they can meet ultra-low NO_x emissions standards for heavy-duty onroad vehicles.

On April 13, 2017 the California Air Resources Board submitted a petition to EPA calling for an update of locomotive emission standards to Tier 5. These standards would align locomotive emission levels to those currently in place for heavy-duty trucks. These emission standards can be met with currently existing cost-effective technologies.

OTC calls on EPA to adopt new engine standards and work with OTC in partnership to implement programs to reduce NO_x emissions from both heavy-duty diesel onroad vehicles and locomotive engines.

Adopted by the Commission on June 6, 2017.

A handwritten signature in blue ink, appearing to read 'J. Snyder', is written over a horizontal line.

Jared Snyder
OTC Chair