

OTC Fall Meeting

November 17th, 2016

Washington, DC

Mobile Source Committee Update



Overview of Presentation

- Review Committee Charge
- Review of Mobile Source Committee Progress and Recommendations
 - Aftermarket Converters
 - Anti-idling
 - Ports
 - Heavy-duty Sector NO_x Reductions

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 Converters: EPA's Policies

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 Converters: Building a Coalition

Why? EPA has not moved forward to improve the broken aftermarket policy despite repeated calls from the Current Partners:

- OTC States
- MECA
- Auto Care
- Colorado
- NACAA
- CARB

By expanding the coalition we hope to push EPA to act.

This coalition could help in the future with other mobile issues such as Heavy Duty NO_x standards.

Aftermarket Converters: Recent Developments

OAQPS has expressed interest in the aftermarket policy, potentially for the “full remedy”

Autocare has been discussing aftermarket converters with House Energy & Commerce Committee staff, which may have prodded some action

Maine received a letter from OECA on August 22

- Stated that the 1986 policy does not adequately “address aftertreatment devices now found on motor vehicles with diesel engines”
- “We agree that there would be benefits to nationwide requirements for aftermarket converters, and are carefully considering the right path forward”

BNA Environment and Inside EPA both had reports on the movement in the area

Anti-Idling

Reducing unnecessary idling could lead to large emission reductions

OTC has developed several tools for the states

- Nonroad Idling Model Rule
- Idling Best Practices Document

MSC recommends moving forward with a regional policy – potential options:

- Truck stop electrification expansion
- Freight idling rules
- Idling reduction commitments
- Regional education efforts
- Regional enforcement strategy



Marine Ports: Nonattainment Near Ports

Port-related operations are significant sources of air emissions and greenhouse gases.

Many ports are in areas with existing air quality challenges and nearby populations.

The largest sources of port-related emissions are vessels and trucks.

EPA Ports Workgroup

Established Summer 2014

EPA asked their mobile sources advisory group (MSTRS*) for recommendations on:

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

Considerations:

- “Ports” includes all the operators that move cargo in and out of ports – not just the Port Authorities
- Existing port and port-related environmental improvement programs
- Ports in the context of the broader transportation supply chain
- Previous studies/recommendations and other relevant programs

* MSTRS is the US EPA’s Clean Air Act Advisory Committee’s Mobile Sources Technical Review Subcommittee

EPA Ports Workgroup: Recommendation

EPA should establish a voluntary ports environmental performance program.

Working Name:

“PACE: Port Action for a Clean Environment”

➤ Intent: drive continuous improvement by:

- Providing access to resources and tools,
- Sharing expertise on freight and passenger movement and port-related health impacts,
- Better aligning federal agency programs and funding, and
- Advancing the adoption of clean, innovative technologies and operational strategies.

EPA Ports Workgroup: Ports Program Design

Provide funding, technical resources, and expertise to enable and encourage environmental improvements

Structural components:

- Set goals, track progress, and incorporate ongoing feedback
 - Example: Work collaboratively with a specified number of ports in a given timeframe (e.g., 20 ports by 2020)
 - Establish a voluntary registry of goals and progress
 - Publish results
- Evaluate the feasibility and added value of a formal tiered program
 - Support existing programs like Green Marine, SmartWay and Clean Cargo

Focal Areas:

- Emission Reduction Strategies (technologies and operations)
- Community-Port Engagement
- Coordinating Relevant Government Programs
- Increasing and Targeting Funding
- Information Clearinghouse and Communications
- Inventories and Metrics

EPA Ports Workgroup: Next Steps

Recommendations were approved unanimously on Sept. 7 by the national Clean Air Act Advisory Committee, and were sent to the US EPA Administrator for action.

- 35 specific recommendations, 6 program areas
- 97 page report

EPA Administrator responds with planned actions.

- Implementation planning is already underway in OTAQ

OTC MSC recommends collaborating with EPA as needed during EPA's implementation process

Reducing Emissions from the HD Sector

Heavy Duty GHG Rule finalized on August 16, 2016

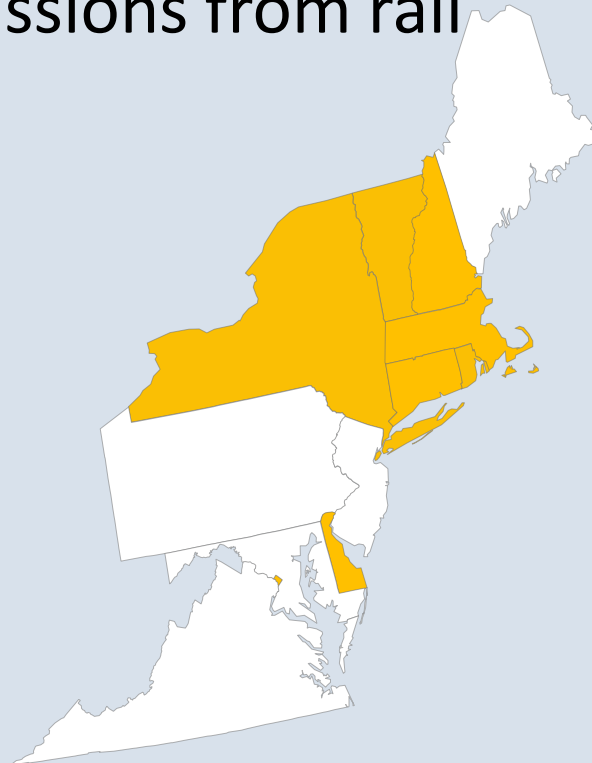
- No additional NO_x reductions are in the final rule
- Preamble responded to need for further work to reduce NO_x emissions and cited:
 - OTC and other RPO Comments
 - SCAQMD petition



Reducing Emissions from the HD Sector

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



Questions



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