

**Non-Road Idling Model Rule
Lightering Update
Drayage Workshop and White Paper**

**OTC Mobile Source Committee Report
September 16, 2010
Baltimore, MD**



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Presentation Outline

- Non-Road Idling Model Rule
 - Model Rule Elements
 - Next Steps
- Lightering & Stakeholder Outreach
- Drayage Trucks
 - Background and Strategy
 - Related Workshops

Non-Road Idling Background

- Non-Road diesel engines are a major sources of
 - Oxides of Nitrogen (NO_x),
 - Fine Particulate Matter (PM_{2.5}),
 - Oxides of Sulfur (SO_x), and
 - Toxic Air Pollutants
- Many states prohibit extended idling of highway diesel trucks, but only a few prohibit extended idling of non-road equipment
- Strategies and technologies to reduce diesel non-road idling exist

Non-Road Idling

- NESCAUM working with the OTC Mobile Source Committee drafted a model non-road idling rule
- The draft rule provides a template regulation for OTR states to use when introducing restrictions on non-road equipment idling
- OTC is seeking comments on the draft model rule

Purpose of Non-Road Idling Model Rule

- Reduce emissions by reducing unnecessary non-road equipment idling
- Equipment owners and operators could save money by reducing fuel use and maintenance costs

Sources of Model Non-Road Rule

- Three states in the OTR have non-road idling restrictions in place: Connecticut, New Jersey, and Rhode Island. California also has a regulation in place
- Applicability and exemptions vary in the four rules
- Discussions with regulators provided insights which in some cases informed the language in the draft model rule

Draft Model Rule: Idling Limit

- Non-road diesel equipment shall not be permitted to idle for more than three (3) minutes, subject to specific exemptions

Draft Model Rule: Applicability

- This regulation would apply to:
 - Any person, entity, owner, or operator of a property or location where non-road diesel equipment is operated;
 - Owners or operators of non-road diesel equipment; or
 - The holder of the permit for the activity for which the non-road diesel equipment is being operated.

Draft Model Rule: Applicability

- Non-road diesel equipment subject to this regulation would include:
 - Construction equipment;
 - Mining equipment;
 - Landscaping equipment;
 - Recycling equipment;
 - Landfilling equipment;
 - Manufacturing equipment;
 - Warehousing equipment;
 - Composting equipment;
 - Airport ground support equipment; and
 - Equipment used for various industrial activities.

Draft Model Rule: Non-Applicability

- This regulation does not apply to:
 - Locomotives;
 - Marine engines;
 - Recreational vehicles;
 - Farming equipment;
 - Military equipment when it is being used during training exercises, emergency or public safety situations; or
 - Non-road diesel equipment owned and operated by an individual for personal, non-commercial purposes.

Draft Model Rule: Exemptions

- The following situations are exempt from this regulations:
 - Idling necessary to ensure safe operation of the equipment;
 - Idling for testing, servicing, repairing, or diagnostic purposes;
 - Idling when the diesel engine is utilized in whole or in part for necessary and prescribed mechanical or electrical operation;
 - Idling for less than fifteen (15) minutes when queuing;
 - Emergency or public safety capacity; and
 - Idling for state or federal inspection.

Next Steps

- Stakeholder review and input on the model rule
 - Comment deadline is September 30, 2010
- Incorporation of comments into model rule
- Finalize model rule
- Presentation of Model Rule to OTC Commissioners in November

Update on Lightering Activities

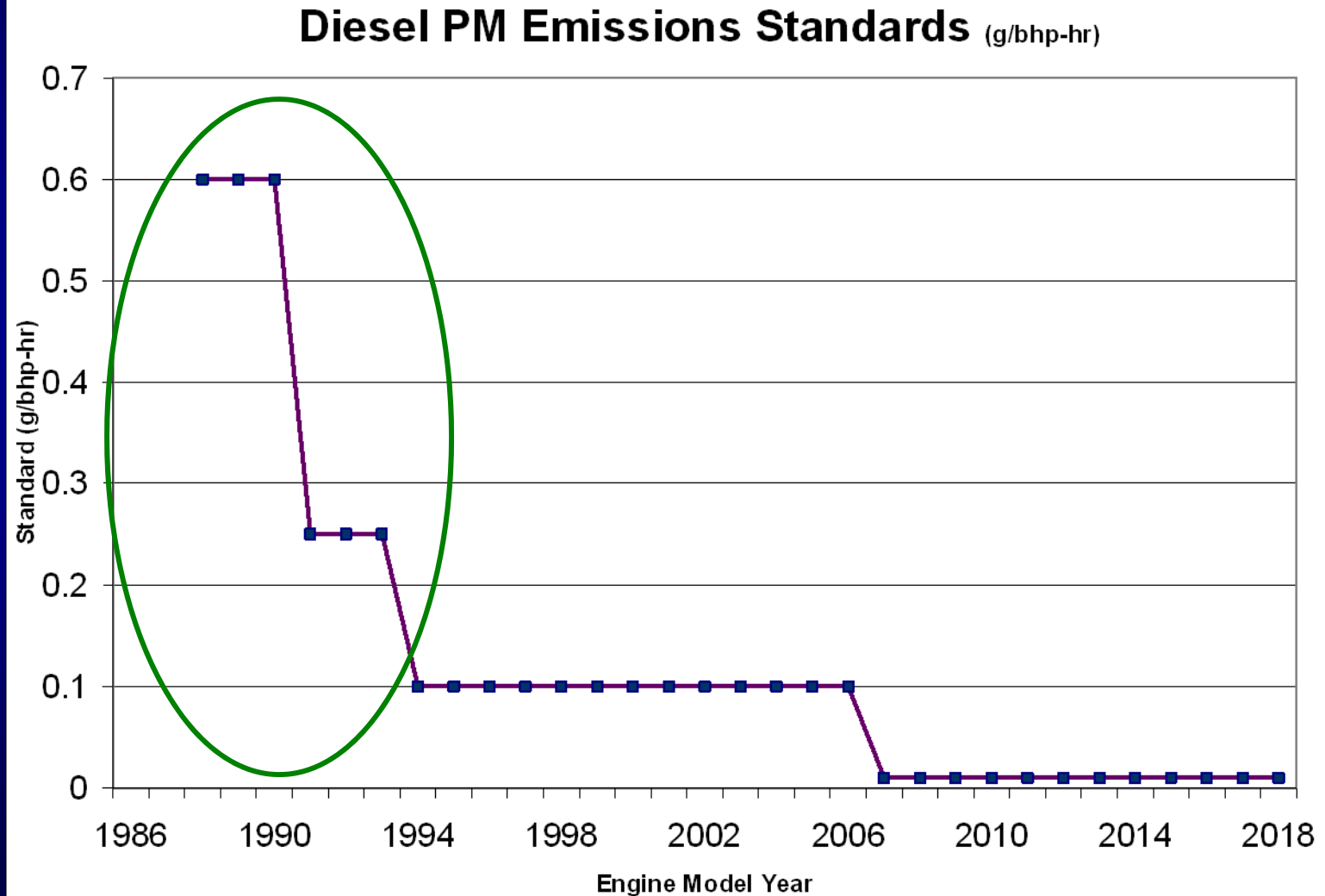
- The White Paper was presented at the OTC Mobile Source Committee meeting in March, 2010
- Delaware is the only state in the region that currently regulates emissions from lightering activity
- The majority of lightering activity occurs in New York State
- Working on outreach to stakeholders
- NESCAUM is drafting a lightering model rule that OTR states will be able to use should they move ahead with regulations
- First draft of a Model Rule was posted on the OTC web site

Drayage Trucks

- Drayage (dray) trucks move goods to and from ports and regional distribution centers.
- Emissions from dray trucks are a sizable component of port emissions, estimated in NY and NJ, for example, to contribute 25% of the NOx emissions and 12% of PM2.5 emissions to total port emissions.
- Emissions from the trucks impact the neighborhoods where they are driven.

Focus of the Strategy

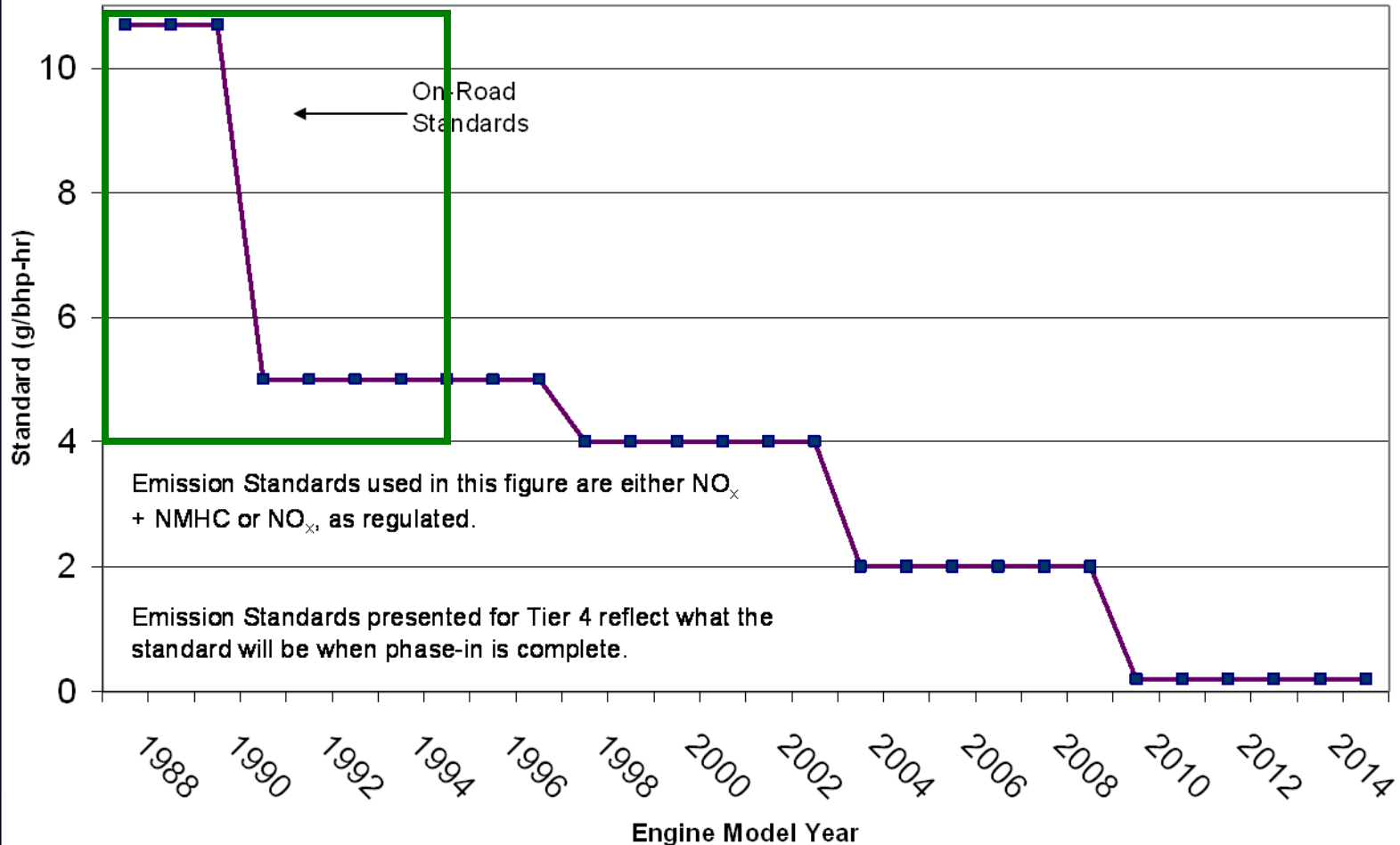
Oldest most polluting trucks



Focus of the Strategy (cont.)

Oldest most polluting trucks

Diesel NO_x Emissions Standards (g/bhp-hr)



Focus of the Strategy (cont.)

- Common nexus – ports
- Solutions will be unique to each port
 - Limit access by age of the truck
 - Truck retirement incentives
 - Others???

Actions

- OTC White Paper – Incorporated comments
- USEPA Funding Opportunities
- MARAMA Workshop – June
- NESCAUM Workshop - October

USEPA Funding Voluntary Programs

- USEPA grants helping to reduce port dray truck emissions with retrofits, repowers, and replacements (DERA/ARRA)
 - Maryland - \$500,000
 - Philadelphia - \$350,000
 - Hampton Roads - \$1,026,000
 - NY/NJ - \$7,000,000
 - MARAMA - \$3,000,000

Drayage White Paper

- NESCAUM prepared a white paper which:
 - estimated drayage-related NO_x and PM_{2.5} emissions in the region
 - Provided an estimate of potential PM_{2.5} and NO_x emissions reductions with regional adoption of the Port of New York and New Jersey truck replacement program
- Comments to date on the white paper have been incorporated into the draft and the white paper will be redistributed prior to the northeast drayage workshop

Update on Drayage Workshops

- In June, MARAMA held a workshop for practitioners to discuss approaches to reduce pollution from drayage activities
- Representatives from EPA, state and local agencies, environmental nonprofits, and industry got to know each other and shared information on East Coast dray truck emission reduction efforts.
- Representatives from ports in Baltimore, Philadelphia, Hampton Roads (VA), and New York/New Jersey were present.

Workshop Update, MARAMA

- Issues discussed at MARAMA's June workshop included:
 - The need for appropriate incentives (carrots & sticks) for the dray trucking community
 - Technical difficulties with obtaining and installing certain diesel emissions controls
 - Rising cost of 2007 and later model year used trucks due to increased demand for cleaner vehicles.

Workshop Update, NESCAUM

- NESCAUM is holding a workshop on October 13th in Boston for practitioners at northeast ports
- Representatives from ports in the northeast, and air program staff will meet to discuss current efforts to reduce emissions; assess the inventory of drayage emissions and activity; and consider possible next steps
- Presentations will provide information on:
 - The Port of New York/New Jersey truck replacement program
 - The Port of New Haven truck stop electrification program
 - Technical work being conducted by Massport to assess drayage truck activity

Summary of the Next Steps

- Non-Road Idling
 - Stakeholder Comments due September 30th
 - November Commission Meeting
- Lightering
 - Draft Model Rule
 - Stakeholder Meeting & Comments
 - November Commission Meeting
- Dray Trucks
 - NESCAUM Workshop
 - November Commission Meeting