

OTC Mobile Sources Committee Overview

OTC and MANEVU Stakeholders Meeting

October 9, 2025

Mobile Sources Committee

Chair, Paul Farrell, CT Department of Energy and Environmental Protection



OZONE TRANSPORT COMMISSION

Presentation Overview

Mobile Source Committee (MSC) 2025 Charge

- ✓ Light-, Medium-, and Heavy-Duty Vehicle Emissions Standards
- ✓ Tampering and aftermarket catalysts
- ✓ Cross-committee coordination
- ✓ Provide technical and policy support where needed, as resources allow

Light-, Medium-, and Heavy-Duty Emissions Standards

Tracking the S177 Waiver Revocation

- The committee continued to track the Congressional Review Act resolution to disapprove the waiver decisions related to Advanced Clean Cars II, Advanced Clean Trucks, and the Heavy-duty Low NOx Omnibus Rule
- The resolution was passed, but is currently undergoing legal challenges
- Some section 177 states have issued enforcement discretion, executive orders, and other guidance documents to cover implementation of these rules during this period of uncertainty.

Light-, Medium-, and Heavy-Duty Emissions Standards

State Updates on ACC II, ACT, and HDO

ACC II Implementation Model Year

2026	2027
CA, MA, NY, OR, VT, WA	CO, DC, DE, MD, NJ, NM, RI

ACT Implementation Model Year

2024	2025	2026	2027
CA	MA, NJ, NY, OR, WA	VT	CO, MD, NM, RI

HDO Implementation Model Year

2024	2025	2026	2027
CA	MA, OR	NY, VT, WA	CO, NM, NJ, RI

- MD issued an [executive order](#) to not enforce ACT or ACC II sales requirements in MY 2027 and MY 2028 unless certain conditions are met
- VT issued an [executive order](#) to not enforce ACT, HDO, and ACC II sales requirements until December 31, 2026*
- [MA](#) and [NY](#) used enforcement discretion to not enforce ACT (MYs 2025 & 2026) or ACCII sales requirements (MYs 2026 & 2027)*
- OR used enforcement discretion to not enforce [ACT](#) sales requirements in MY 2025 and 2026, and MY2026 for [ACCII](#)*
- [MA](#) and [OR](#) issued rules to delay HDO implementation from MY 2025 to MY 2026
- CARB issued a [Manufacturer Advisory Correspondence](#) containing guidance for enforcement and implementation of ACCII, ACT, and HDO
- [WA](#) issued guidance for OEMs pausing deficit generation until 12/6/25 for ACCII and ACT, pausing HDO for MY 2026*
- NJ issued an administrative order stating that it will not impose penalties for ACT net deficits for MY25*

*Conditioned on no vehicle ratioing by OEM

Light-, Medium-, and Heavy-Duty Emissions Standards

Responding to Proposed EPA Action to Reconsider Vehicle Emissions Standards

- The OTC Mobile Sources committee developed written comments in response to EPA's proposal to revoke the 2009 endangerment finding on greenhouse gas emissions
- Revoking the endangerment finding would enable EPA to repeal the GHG emission standards for motor vehicles
 - EPA included revocation of GHG standards for light-duty multi-pollutant rule and the Phase 3 GHG standards for heavy trucks (needed or redundant?)
- The comments strongly oppose EPA's proposal and
 - explain the importance of the OTC,
 - discuss the impact of climate change on local and regional ozone pollution,
 - and flag that the proposal dramatically hinders states' ability to address the OTC's ozone problem.

Tampering and Aftermarket Catalysts

ERG Study on MHD Tampering in the United States

- The OTC Mobile Sources committee continues to receive updates on ERG's efforts to get a nationwide picture of tampering in the U.S.
- Committee members were made aware of continued opportunity to participate in the study
- The Committee will receive a more detailed report when the study is complete

Tampering and Aftermarket Catalysts

Massachusetts I/M Program

- Annual Safety and Emissions inspection requirement
 - And on change of ownership
- Pass/Fail on-board diagnostic (OBD) testing on vehicles up to 14,000 lbs. GVWR for gas, diesel, and alt fuel less than 15 years old
- Advisory OBD testing for HD diesels >14,000 lbs. GVWR Model Year 2014 and newer
 - “Fast Pass” alternative to HD Diesel Opacity test
- ~3.6 M emissions tests per year

Tampering and Aftermarket Catalysts

Detering Tampering in Massachusetts

- Flagged vehicles automatically fail inspection and referred to the Motorist Assistance Center (MAC)
 - Vehicle cannot be retested until “MAC flag” manually cleared
- Motorist makes appointment to visit MAC
- MAC evaluates vehicle, document tampering
 - Visual inspection underhood and on a lift (ID hardware tampering)
 - Diagnostic OBD test/record (ID software tampering)
 - If vehicle still tampered (i.e., not corrected before appointment), motorist told to return vehicle to stock and follow up with another appointment
 - Once tampering fixed, MAC removes the flag and vehicle can be reinspected

Cross Committee Coordination

- The leadership of the MSC continues to coordinate with the modeling committee to assess the impact of the repeal of federal motor vehicle emission standards

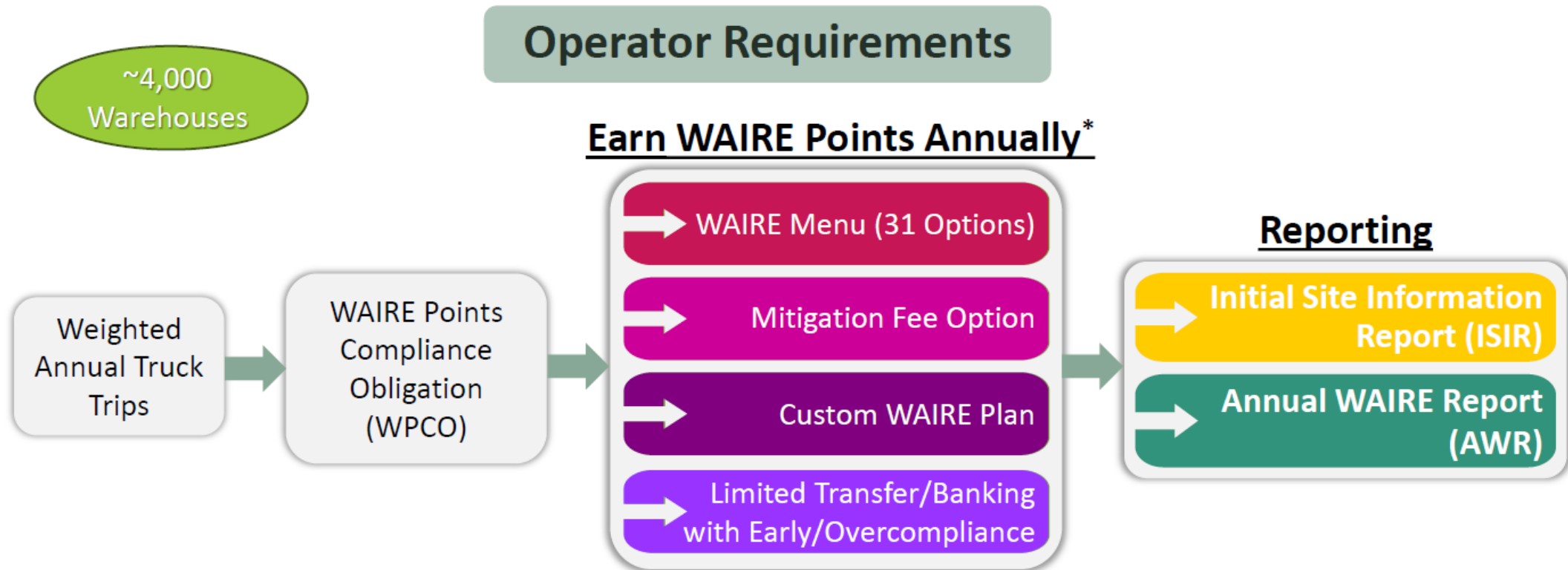
As Resources Allow: Indirect Source Rule

- The Committee heard from the South Coast Air Quality Management District (SC AQMD) about their Indirect Source Rules (ISRs)
- ISRs are regulatory tools that can be used to address ozone nonattainment by mitigating indirect mobile source emissions at certain facilities and infrastructure
- SC AQMD has ISRs that address large commute worksites, warehouses, and railyard & intermodal facilities
- SC AQMD's ISR program monitoring shows reductions in emissions of ozone precursors at regulated facilities

As Resources Allow: Indirect Source Rule



WAIRE Program – How Does It Work?

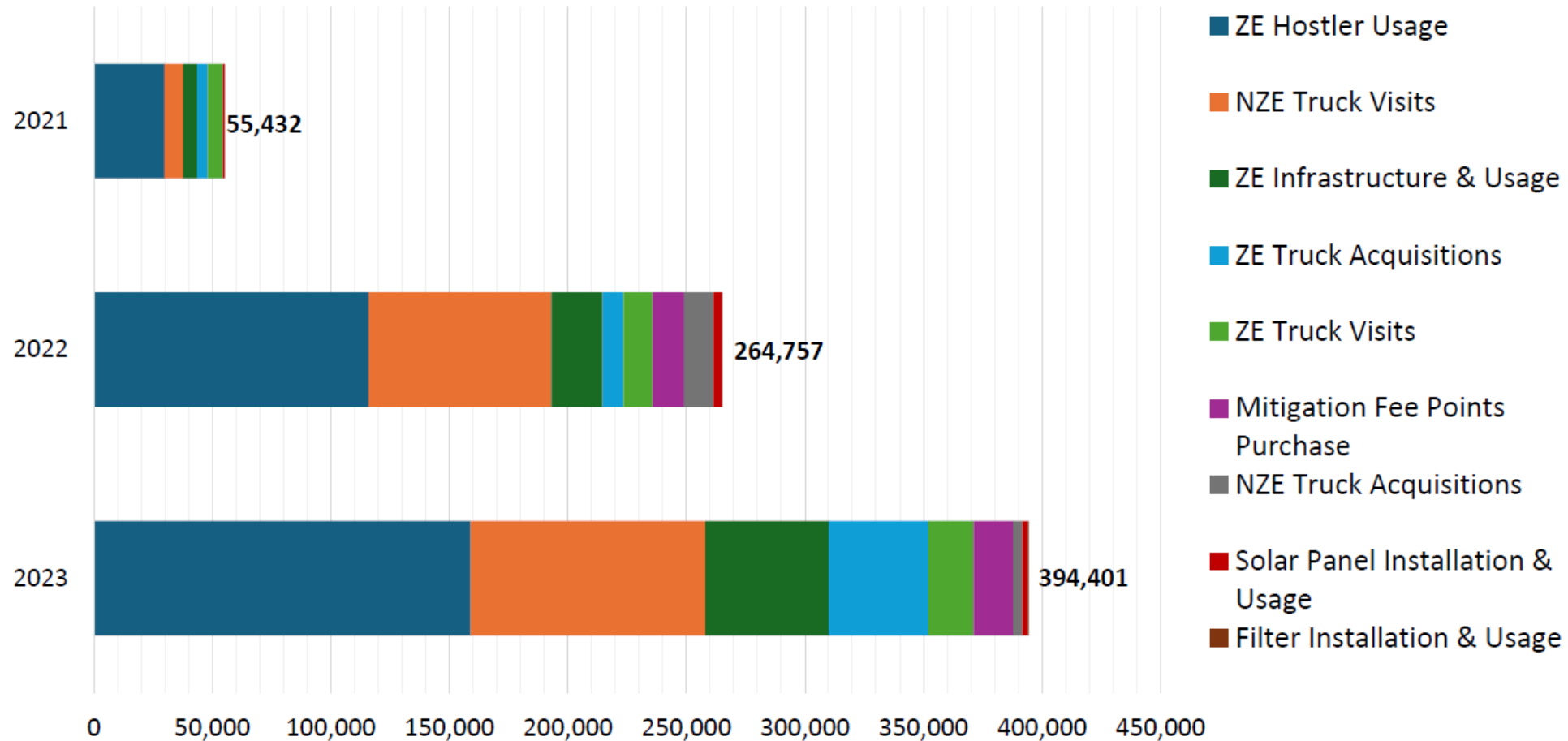


* Warehouses phased in over five years

As Resources Allow: Indirect Source Rule

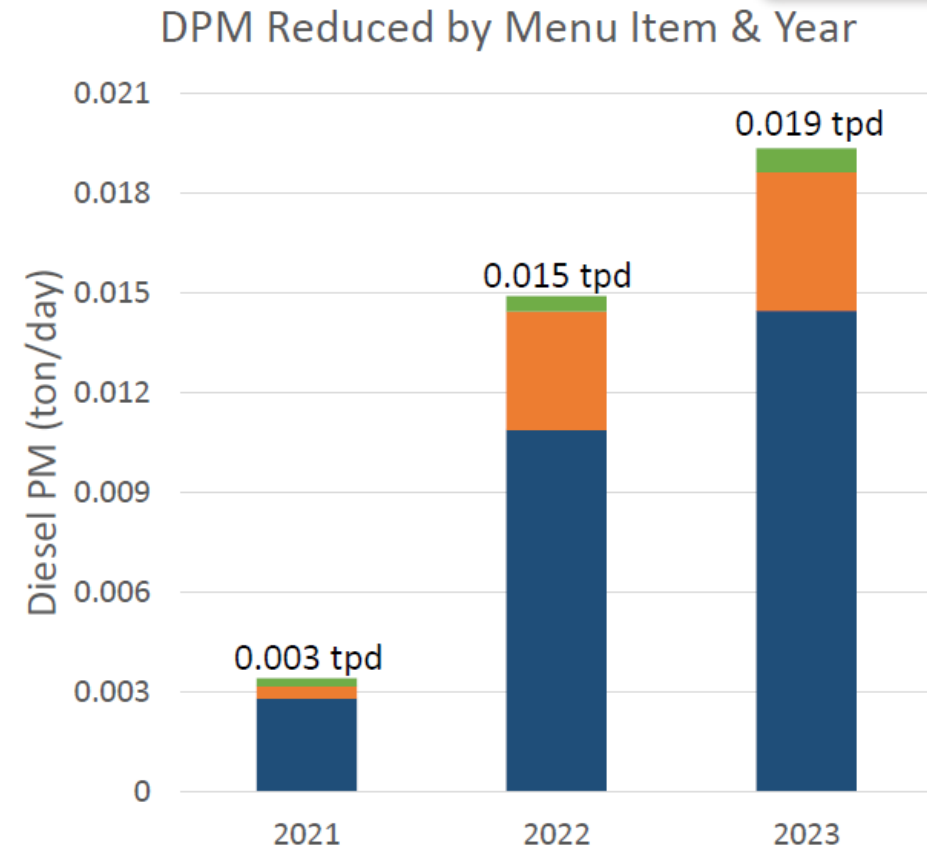
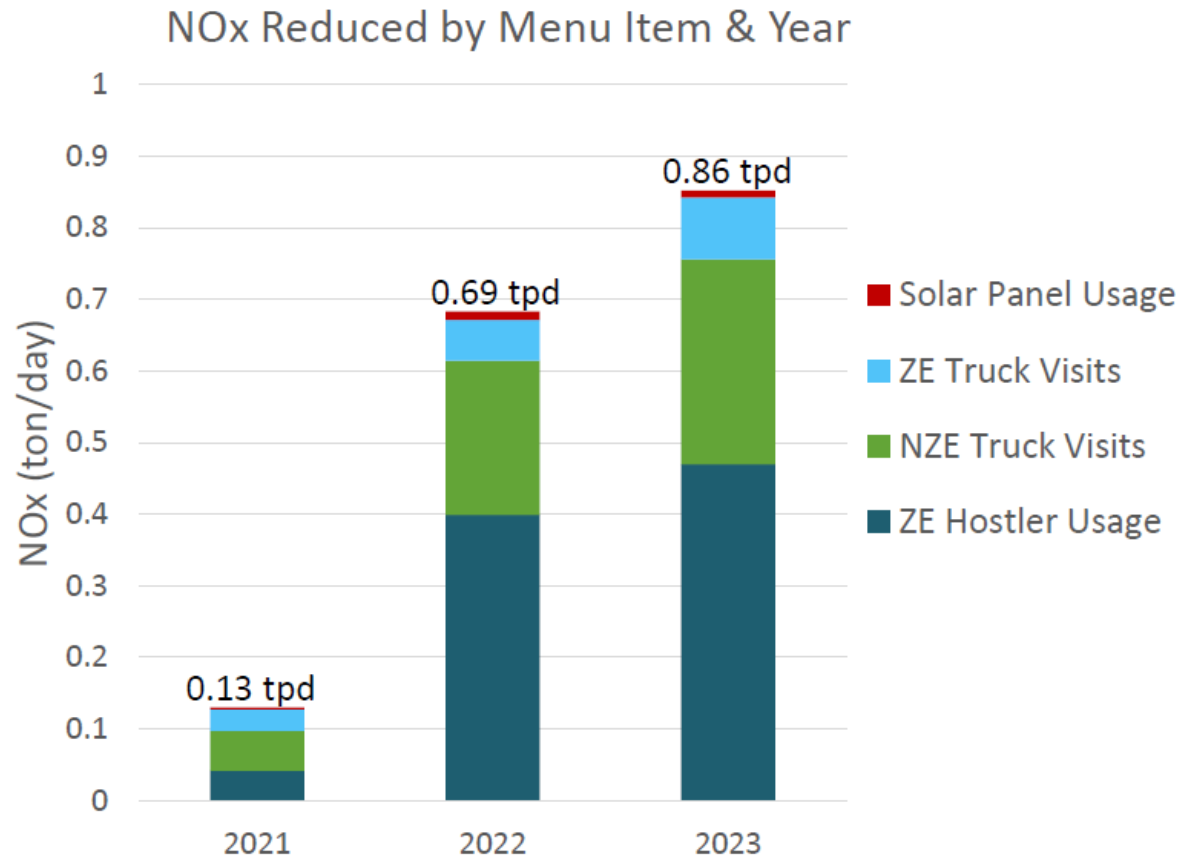


Total WAIRE Points Earned By Year



As Resources Allow: Indirect Source Rule

Emission Reductions From Reported Actions



Summary and Discussion

Light-, Medium-, and Heavy-Duty Emissions Standards

- Tracked the S177 waiver revocation and associated state enforcement discretion
- Responded to proposed EPA action to reconsider vehicle emissions regulations

Tampering and Aftermarket Catalysts

- Continued to engage with ERG on nationwide MHD tampering study
- Received a presentation from Massachusetts on their I/M program and anti-tampering efforts

Cross Committee Collaboration

- Coordinated with the Modeling Committee on changing federal motor vehicle emission standards

Technical Support on Policy Where Needed

- Received a presentation from South Coast Air Quality Management District on Indirect Source Rules

Thank you!

Mobile Sources Committee

Chair, Paul Farrell, CT Department of Energy and Environmental Protection



OZONE TRANSPORT COMMISSION