

OTC Mobile Sources Committee Overview

OTC and MANEVU Annual Public Meeting

June 11, 2025

Mobile Sources Committee

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



OZONE TRANSPORT COMMISSION

Presentation Overview

Mobile Source Committee (MSC) 2024 Charge

- ✓ Mobile Source Developments
- ✓ Medium- and heavy-duty trucks (MHDs).
- ✓ Tampering and aftermarket catalysts.
- ✓ Cross-committee coordination.
- ✓ Provide technical and policy support where needed, as resources allow.

Mobile Source Developments

- Congress has used the Congressional Review Act (CRA) to disapprove the waivers of preemption for CA's Advanced Clean Trucks, Heavy-duty Low NOx Omnibus, and Advanced Clean Cars II programs
- Creates uncertainty for states that adopted CA's programs and who rely on these reductions in future SIPs
- Creates uncertainty for OTC states in EPA's future baseline emissions projections critical for ozone planning

Mobile Source Status in Ozone SIPs

- If the waiver disapprovals hold, states will be pre-empted from adopting CA's clean vehicle programs, and instead must default to weaker federal standards
- EPA has also indicated it plans to reconsider recent federal mobile source standards
- Over 60% of ozone-forming NO_x emissions in the NYC nonattainment area are from mobile sources under federal authority

Medium and Heavy-Duty Trucks

The International Council on Clean Transportation (ICCT) conducted an analysis of the emissions benefits of Advanced Clean Trucks, Heavy-Duty NOx Omnibus, and California Phase II GHG tractor trailer standards

State	Cumulative NOx Emissions Avoided (tons)	
	2020-2040	2020-2050
Connecticut	7,320	20,410
D.C.	1,640	4,600
Massachusetts	26,950	71,960
Maryland	36,480	99,760
Maine	10,410	28,770
New Jersey	45,220	125,380
Pennsylvania	84,480	231,140
Rhode Island	4,740	13,080
Vermont	3,010	8,190

- States still need to reduce emissions to meet Clean Air Act requirements
- If states cannot move forward with S177 programs, reductions will need to be made in other sectors, likely stationary sources
- Additional reductions from stationary sources are expected to be challenging and expensive as many of the most cost-effective controls are already required

Tampering and Aftermarket Catalysts

- ERG also presented to the MSC about their ongoing efforts, funded by EPA, on anti-tampering
- ERG is running a pilot to evaluate commercial tools to detect signs of potential tampering and develop estimates of the extent of tampering throughout the US
- New Jersey participated in the pilot and is currently awaiting analysis of the data submitted to ERG
- ERG is still accepting additional state participation

Cross Committee Collaboration

- The MSC received an update from the Modeling Committee on plans to incorporate MOVES5 into regional emissions modeling.
- This includes updates that reflect
 - EPA's LD/MD multipollutant regulation
 - EPA's HD Phase 3 GHG regulation
- EPA, however, has announced it plans to reconsider these regulations

As Resources Allow: Non-Road

- The Mobile Sources Committee heard from MARAMA on NOx and PM (2.5 & 10) Emissions from Non-road Agricultural and Construction Equipment in the eastern U.S.

Nonroad Equipment Emissions in the Eastern States 2022 Summary

Agricultural Equipment

Pollutant	Emissions (Tons)		% of Total Nonroad Emissions
	Annual	O ₃ Season*	
NOx	65,031	35,074	16%
PM ₁₀	4,593	2,487	11%
PM _{2.5}	4,454	2,412	11%

Construction Equipment

Pollutant	Emissions (Tons)		% of Total Nonroad Emissions
	Annual	O ₃ Season*	
NOx	112,882	51,248	28%
PM ₁₀	9,971	4,536	24%
PM _{2.5}	9,595	4,365	25%

* Preliminary results from EMF tool

As Resources Allow: ACC II

The ICCT conducted an analysis of emissions benefits of Advanced Clean Cars II

State	Cumulative NOx Emissions Avoided (tons)	
	2025-2030	2025-2040
Connecticut	460	4,341
Delaware	123	1,169
Massachusetts	855	8,551
Maryland	668	5,978
Maine	236	2,274
New Jersey	881	8,886
New York	1,675	15,231
Rhode Island	114	1,134
Virginia	2,299	17,511
Vermont	74	811

Summary and Discussion

Mobile Source Developments

- CRA disapproval of CA clean vehicle waivers

Medium- and Heavy-duty Trucks

- ICCT analysis of emissions benefits of S177 heavy duty programs

Anti-Tampering

- Explored opportunities for states to participate in a tampering detection pilot project with ERG
- Followed state pilot to identify tampered HD vehicles

Cross Committee Collaboration

- Coordinated with the Modeling Committee on integrating MOVES5 into regional emissions modeling

Technical Support on Policy Where Needed

- Received a report on emissions from non-road sources in the eastern U.S.
- ICCT analysis of emissions benefits of ACC II

Thank you!

Mobile Sources Committee

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



OZONE TRANSPORT COMMISSION