



**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

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.

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.



Jared Snyder
OTC Chair