

June 24, 2024

Trish Clary
Senior Director, Environmental Programs
Union Pacific Railroad
1400 Douglas Street
Omaha, Nebraska 68179
TRCLARY@up.com

Dear Ms. Clary,

The California Air Resources Board (CARB) received Union Pacific Railroad's (UPRR) 2023 Fleet Average Agreement Annual Compliance Report (Compliance Report) pursuant to Section IV.B. of the 1998 Memorandum of Mutual Understanding and Agreements, South Coast Locomotive Fleet Average Emissions Program (1998 MOU). CARB staff determined that in 2023 UPRR complied with provisions of the 1998 MOU which requires the final annual locomotive fleet average be under 5.5 grams per brake horsepower-hour (g/bhp-hr) for oxides of nitrogen (NO_x) for locomotive operations in the South Coast Air Basin, to meet the final fleet average standard.

Compliance Evaluation: Calendar Year 2023

UPRR's Compliance Report included the following:

1. Signed letter of certification verifying the information in the report is true, accurate, and complete.
2. Fleet summary information regarding the methodology used to comply with the 1998 MOU (Form F-S).
3. Fleet average calculation showing the individual locomotive megawatt-hours (MWh) and emissions levels, as well as calculations and any necessary adjustments (Form F-A-1 through Form F-A-6).

UPRR's 2023 Compliance Report submittal included activity information (in MWh) and emission levels for over 5,000 locomotives. CARB staff determined that for calendar year 2023, UPRR's final fleet average of 5.9 g/bhp-hr meet the NO_x compliance level set forth in the 1998 MOU after adjustments were made by utilizing 0.4 of the ULEL credits, bringing the final fleet average to 5.5 g/bhp-hr. UPRR's remaining ULEL balance is 22.8.

CARB will make the UPRR Compliance Report information publicly available except for individual locomotive activity levels, which are business confidential according to California Government Code Section 6254.7. The activity data will be aggregated by tier and emission level.

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If you have any questions or comments, please contact Layla Gonzalez, Manager, Freight Systems Section at Layla.Gonzalez@arb.ca.gov or Jaskamal Kaur, Air Pollution Specialist, Freight Systems Section at Jaskamal.Kaur@arb.ca.gov.

Sincerely,



Ajay Mangat, Chief, Freight Technology Advancement Branch
Transportation and Toxics Division

cc: Tom Cappucci, Senior Manager of Environmental Programs, tgcappuc@up.com
Layla Gonzalez, Manager, Freight Systems Section, Transportation and Toxics Division
Jaskamal Kaur, Air Pollution Specialist, Transportation and Toxics Division