

WSPA Comments on Predictive Model Update

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Critical Issues

- Process has significant gaps and deficiencies
- Off-road data are inadequate to enact regulations; new on-road data may help inventory modelers
- ARB seems headed toward significant gasoline reformulation with potential for large impact on supply
- Important policy issues are not being addressed adequately

Emissions Inventory

- Overall, have serious concerns with methodology
 - Predictions don't match data (per Tom Darlington comments)
- On-Road Emissions
 - ARB needs to respond to comments provided
 - ARB should integrate expected new data
 - CRC E-65 results
 - CRC E-77 project generating data on whole cars, may be more useful to EMFAC
- Off-Road database is inadequate
 - Predicted off-road effect of ethanol is larger than on-road effect
 - No data on pleasure craft, largest source of ethanol effect
- Why isn't ARB collecting more data?
 - Current research program doesn't include any funding for permeation studies, especially on off-road equipment

Comments on Process

- Statistics group is functioning well
- Expert groups on inventory and reactivity should be formed as soon as possible
 - Serious concerns about inventory
 - Inventory development should be subject to same reviews and process as statistical analysis and development of equations
 - Inventory should be finalized before it's combined with equations to complete Predictive Model
- Path to regulations is unclear

WSPA Suggestions

- Adopt structured approach to rulemaking
 - Define steps and reasonable schedule for regulatory development
 - Define data needs
 - Collect additional data if necessary
 - Enact regulations after data and technical/policy analyses are completed
 - Allow adequate time for compliance (e.g. refinery modifications, new hardware designs)
- Form inventory and reactivity expert groups (ARB)
- Initiate producibility study group (CEC, ARB)

Important Policy Issues

- How to turn PM equations and inventory estimates into regulations?
 - Why should gasoline shoulder burden of on-road and off-road ethanol use?
- What is time frame for making up excess emissions?
- Are off-road data adequate to impose new controls?
- What options should be considered for new controls?