



July 23, 2019

Jessica Brakora,
Office of Transportation
& Air Quality, US EPA

EPA Overview of the Cleaner Trucks Initiative

NACAA Mobile Sources and Fuels Committee

Overview

- Motivation
- Cleaner Trucks Initiative
- Program Elements being Explored
- Current EPA Activities
- Rulemaking Schedule
- Opportunities for Ongoing Engagement

Motivation

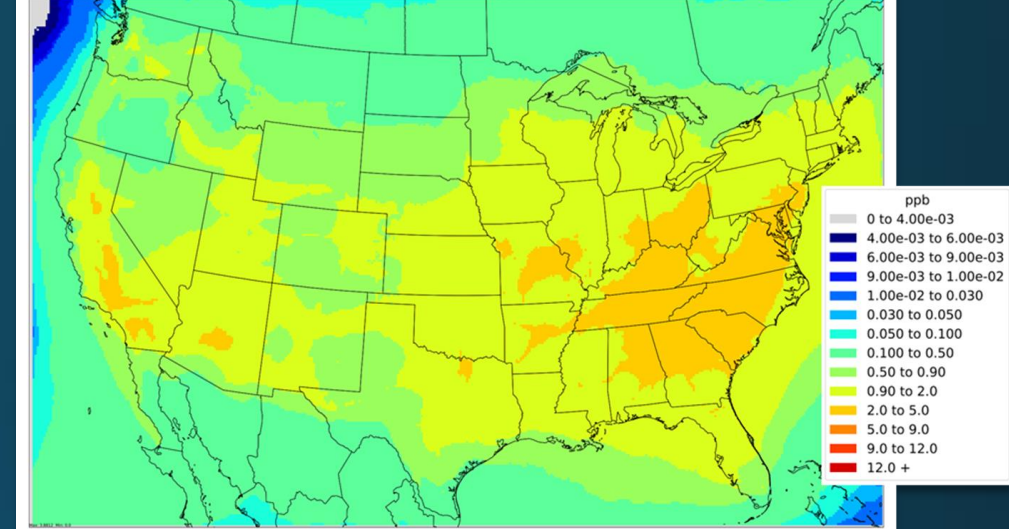
- EPA last revised NOx standards for heavy-duty trucks nearly 20 years ago
- We have an opportunity to modernize the requirements to better reflect the capability of available emissions control technologies
- EPA current emissions standards have lowered overall NOx emissions, but have not resulted in effective emission control under low-load conditions
 - By addressing low-load operation, we can improve NOx emission controls in cities and in areas of high traffic

Heavy-Duty Diesel Vehicles are a Large Contributor to Mobile Source NOx Emissions

- NOx emissions produced by heavy-duty diesels are expected to be one of the largest mobile source contributors to ambient ozone in 2025, which will impact air quality over a broad geographic area
- Heavy-duty diesels are also a significant mobile source contributor to ambient PM_{2.5} in 2025, due to
 - NOx emissions which form PM
 - Directly emitted PM

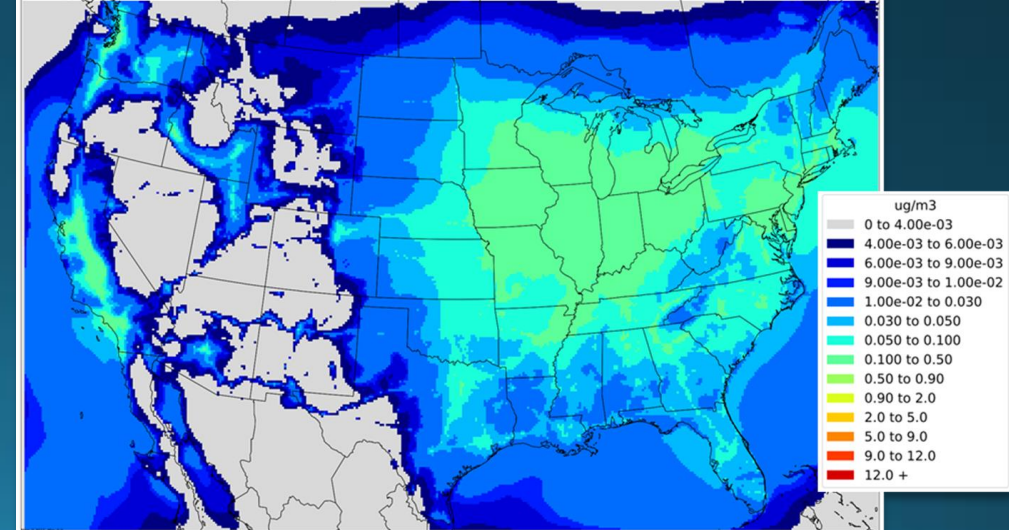
HDD NOx Contribution to Ozone in 2025

Projected 8-h max Average Seasonal Ozone concentration(ppb) from NOx in 2025 Onroad heavy duty diesel



HDD NOx Contribution to Ambient PM_{2.5} in 2025

Projected annual average Secondary PM_{2.5} concentration(ug/m3) in 2025 Onroad heavy duty diesel



State & Local Air Quality Agencies' Petition

Many HD vehicles travel interstate, and areas impacted most by NOx emissions are distributed around the country

June 2016:

~ 20 state and local air quality agencies petitioned EPA to undertake a new HD NOx rule

December 2016: EPA responded

- Acknowledge the need for additional NOx reductions
- EPA will initiate technical work that could be used to support a future action

Petition to EPA for Rulemaking to Adopt Ultra-Low NOx Exhaust Emission Standards for On-Road Heavy-Duty Trucks and Engines

Submitted by:

South Coast Air Quality Management District
Pima County Dept. of Environmental Quality (Arizona)
Bay Area Air Quality Management District (California)
Connecticut Dept. of Energy and Environmental Protection
Delaware Dept. of Natural Resources and Environmental Control, Division of Air Quality
Washoe Co. Health District, Air Quality Management (Nevada)
New Hampshire Dept. of Environmental Services
New York City Dept. of Environmental Protection (New York)
Akron Regional Air Quality Management District (Ohio)
Washington State Dept. of Ecology
Puget Sound Clean Air Agency (Washington)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

December 20, 2016

OFFICE OF
AIR AND RADIATION

Mr. Wayne Nastri
Acting Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Dear Mr. Nastri:

On June 3, 2016, South Coast Air Quality Management District, Pima County Dept. of Environmental Quality, Bay Area Air Quality Management District, Connecticut Dept. of Energy and Environmental Protection, Delaware Dept. of Natural Resources and Environmental Control, Washoe County Health District, New Hampshire Dept. of Environmental Services, New York City Dept. of Environmental Protection, Akron Regional Air Quality Management District, Washington State Dept. of Ecology, and Puget Sound Clean Air Agency ("Petitioners") sent a letter to the Environmental Protection Agency (EPA or the Agency) petitioning the Agency to conduct a rulemaking to establish new ultra-low NOx emission standards for heavy-duty engines and trucks.

Shortly thereafter, a number of other organizations notified the Agency that they were also joining this petition, including Rhode Island Department of Environmental Management, Massachusetts Department of Environmental Protection, Coalition for Clean Air, Vermont Department of Environmental Conservation, San Bernardino Associated Governments, New York State Department of Environmental Conservation, Port of Los Angeles, Sacramento Metropolitan Air Quality Management District, and California Air Pollution Control Officers Association.

In the following memorandum, the EPA provides its response to the June 3 petition. In summary, the EPA will initiate work necessary to issue a Notice of Proposed Rulemaking with the intention of proposing standards that could begin in Model Year 2024 (a major engine and vehicle standards implementation milestone year in the heavy-duty Phase 2 GHG program), consistent with the lead-time requirements of the Clean Air Act.

As the EPA develops this proposal the Agency will engage with a wide range of stakeholders, including the petitioners, the heavy-duty vehicle and engine manufacturers, labor unions, technology suppliers, environmental non-governmental organizations, state and local air quality agencies which were not part of the petition, truck dealerships, trucking fleets, truck drivers and truck owners. The EPA plans to work closely with the California Air Resources Board (CARB) to consider the development of a new harmonized Federal and California program to reduce NOx emissions from heavy-duty on-highway engines and vehicles that could be adopted not only by the EPA, but also by CARB, in order to maintain a 50-state program.

The Cleaner Trucks Initiative

- On November 13, 2018, EPA Administrator Andrew Wheeler announced the “Cleaner Trucks Initiative” (CTI) to address emissions from new heavy-duty trucks and engines
- Our objective is to ensure *real-world* emissions reductions
 - Investigate options for improving current certification and in-use testing requirements
 - Pursue a national, harmonized program
 - Focus on NO_x, but take a broad look at other heavy-duty engine emissions
- Identify cost-effective means of ensuring real-world compliance and explore opportunities to streamline existing requirements

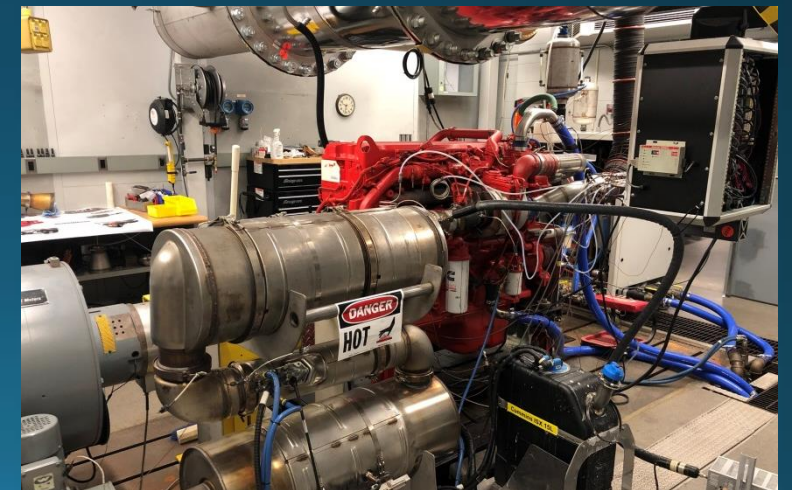


Clean Air Act – Section 202(a) provides specific direction to EPA for Highway Heavy-duty Engines & Vehicles

- Set emission standards for HC, CO, NO_x, and PM
- Revise standards from time to time
- Reflect the greatest degree of emission reduction achievable through technology – considering lead time, cost, energy, & safety
- Standards applicable for the engine/vehicle useful life
- Give appropriate consideration to the cost of compliance
- Provide at least 4 years of lead-time to develop and apply technology and at least 3 years of stability between changes

Key Program Elements being Explored

- **Nationwide Emissions Reductions**
 - Work to closely align CARB and Federal long-term programs
 - Continue technical coordination with CARB and industry
- **Ensure In-Use Emissions Reductions**
 - New in-use protocol that covers “all” in-use operation
 - Conducting and contributing to multiple technology demonstration programs
 - Regulatory useful life and warranty that reflect current operating life
- **Streamline & Modernize Requirements**
 - Accelerated aging protocol for diesel aftertreatment systems
 - Incentives for advanced technologies: 0 gram NO_x
- **Effective EPA Compliance & Enforcement**
 - Utilize onboard data streams to identify emissions compliance concerns early



CTI Rulemaking Timeframe & Current Status

- Targeting 2020 for a Notice of Proposed Rulemaking (NPRM)
 - Comment period after the proposal, followed by Final Rulemaking
- Currently in the information-gathering stage
 - Early outreach to stakeholders
 - Continuing engagement and coordination with California Air Resources Board (CARB) staff on technical work
 - Assessing technical feasibility
 - Evaluating the effectiveness of advanced technologies and compliance strategies
 - Developing cost, benefit, emissions inventory, air quality, and economic analyses

CTI: Early EPA Stakeholder Engagement

(Not Comprehensive)

User Community



Clean Air & Env. NGOs



Suppliers & Labor



OEMs



State/Local/Tribal Governments & Air Associations



Federal Agencies & International Governments



CTI: Ongoing Technical Assessment

(Not Comprehensive)



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- Baseline HDD engine performance over engine dyno test cycles
- HDD cylinder deactivation demonstration
- HD gasoline baseline and advanced technology demonstration



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- Evaluate baseline emissions (HDIUT)
- HD gasoline assessment
- Next generation engine and aftertreatment demonstration
- HDV chassis & PEMS testing
- NO_x sensor performance



- WVU activity and in-use emissions study
- Possible NO_x sensor performance evaluation at SwRI



- Advanced technology demonstration (Stage 1-3 HDD engines)
- Low-load cycle development
- NREL cost study

Additional Stakeholder Data

- Possible telematic data from a HD truck fleet



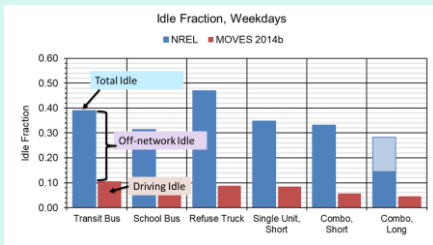
Environment and Climate Change Canada

- HDV chassis & PEMS testing
- NO_x sensor performance

CTI: Major Updates for HD Emissions Projections

New Data On...

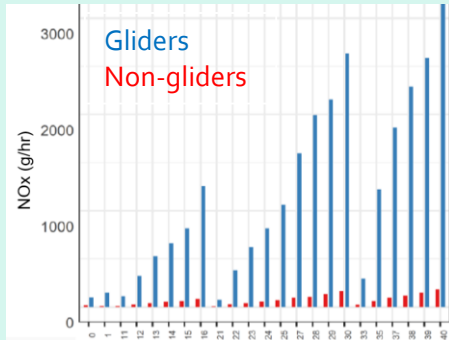
HD Activity



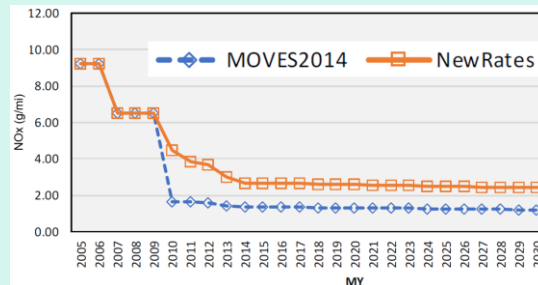
VMT & Vehicle Populations



Glider Vehicles



HD Emission Rates



Updated
for NPRM*

NPRM

Emissions Inventories

Full Air Quality
Analysis (CMAQ)

Benefits Calculations
(BenMAP)

Proposed Program
Benefit Cost Analysis

* For internal regulatory purposes only

CTI Points of Contact in EPA's Office of Transportation & Air Quality

- CTI Rulemaking Team Leads
 - Christy Parsons, Parsons.Christy@epa.gov, 734-214-4243
 - James Sanchez, Sanchez.James@epa.gov, 734-214-4439
 - Jessica Brakora, Brakora.Jessica@epa.gov, 734-214-4936
- Assessment & Standards Division's Heavy-Duty Onroad & Nonroad Center
 - Brian Nelson, Director, Nelson.Brian@epa.gov, 734-214-4278
- Assessment & Standards Division
 - Bill Charmley, Director, Charmley.William@epa.gov, 734-214-4466

NACAA Opportunities for Early Engagement

- **Opportunities for communication**

- Meetings with OTAQ staff to discuss updates on EPA work and share your perspectives related to the rulemaking
- Periodic meetings with OTAQ Office Director Grundler & OAR Assistant Administrator Wehrum

- **Information of interest to us**

- Your perspectives (and analysis where available) on the role of heavy-duty vehicle NO_x emissions in your air quality, or other environmental challenges
 - Is this effort important to achieving your goals, and why?
 - Attainment, transport, visibility, deposition, etc....
 - Any specific data sources, analyses, case studies from your area?
 - Specific issues or concerns with the potential regulatory program?