

September 23, 2006

The Honorable Stephen L. Johnson  
Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Re: *Control of emissions from locomotives and marine diesel engines*

Dear Administrator Johnson:

The Northeast States for Coordinated Air Use Management (NESCAUM) is writing to underscore the importance of effectively controlling emissions from locomotives and marine diesel engines. We urge EPA to establish a particulate filter-based standard in the Agency's locomotive and marine diesel rule as well as robust rebuild requirements for older locomotives and marine C2 engines. We also ask the Agency to release its proposed regulation by the end of this year.

Locomotives and marine diesel engines represent an important and growing source of PM and NO<sub>x</sub> emissions in the Northeast. Given the current standards for other mobile sources, their relative contribution is projected to increase significantly in the next decade. Further, the proximity of major ports and rail yards to urban populations presents a significant public health risk. Modeling data from the Northeast states demonstrate that significant reductions from local and area sources are needed for states to attain the National Ambient Air Quality Standards (NAAQS) for ozone and fine particulate matter (PM<sub>2.5</sub>). Even with the substantial reductions that will be achieved from federal mobile source standards such as the 2007 highway diesel rule, the nonroad diesel rule, and Tier 2 vehicle standards, many areas will need additional reductions from nonroad engines.

In addition to criteria pollutants, nonroad engines emit significant amounts of air toxics. Northeast state inventory data show that as much as 60 percent of formaldehyde and acetaldehyde emissions come from nonroad engines - including locomotives and marine engines. Ambient levels of these toxins exceed health benchmarks in every county of our region.

Recent work conducted by NESCAUM underscores the importance of reducing emissions for these types of engines. Specifically:

- Harbor craft (ferries, tugs, and towboats) emit 50 percent of total marine PM engine emissions at the Port of New York and New Jersey.
- Increased ferry service and ridership at ports in the Northeast has resulted in many more people having greater direct exposure to emissions.
- Ambient concentrations and exposures to fine particulate matter can be extremely high in commuter rail stations. Ambient measurements of PM<sub>2.5</sub> on a commuter rail platform in Boston revealed peak levels as high as 1,000 ug/m<sup>3</sup>. Measured concentrations of PM<sub>2.5</sub> in commuter rail cabins were also very high.
- Diesel commuter rail trains are common in the Northeast. For example, 111 diesel locomotives travel to and from Pennsylvania Station in New York City each day. More than 50 diesel locomotives travel into Boston each day.
- Locomotive rail yards and operations are often located in urban areas. For example, 70 percent of locomotive emissions in Connecticut occur in New Haven and Fairfield counties, a densely populated urban area in nonattainment of the NAAQS for ozone and particulate matter.

Effective control technologies to reduce pollution from diesel locomotives and marine engines are available and should be part of a control program. For example, demonstration projects in New York and Boston Harbor have shown that a range of emission control technologies can be used in harbor craft to significantly reduce emissions. Initial results from a California pilot project demonstrate that retrofitting harbor craft with particulate filters is feasible.

For the reasons listed above, we urge EPA to put in place a stringent control program for locomotives and marine diesel engines. We believe an effective program must contain the following elements:

- Particulate filter-based emissions standards for marine and locomotive engines.
- A rebuild requirement for C2 marine engines.
- A more comprehensive rebuild requirement for locomotive engines. The current program exempts locomotives not operated by Class I railroads. Commuter rail locomotives must be included in a rebuild requirement.

The Northeast states are ready to assist EPA in developing locomotive and marine engine standards that are adequate to protect public health. We look forward to actively participating in the review and comment process, and we welcome the opportunity to collaborate with EPA in the development of this much-needed regulation.

Sincerely,



Arthur N. Marin  
Executive Director

Cc: NESCAUM Directors  
William Wehrum, Acting Assistant Administrator for Office of Air and Radiation  
Margo Oge, EPA OTAQ