Talking Points of Bill Becker for
Meeting of the Nonroad Workgroup of the
CAAAC Mobile Source Technical Review Subcommittee
January 16, 2001

- Thank you for seeking perspective of state and local air agencies on this very important issue
- STAPPA and ALAPCO have tremendous interest in the regulation of nonroad heavy-duty diesels, which pose a significant threat to public health and the environment
- Associations adopted position over two years ago calling for "the most stringent national diesel fuel sulfur standards technologically and economically feasible to ensure maximum emission reductions from existing and emerging light-duty and heavy-duty diesel technology"
- S/A position calls for the same rigorous sulfur cap to be applied to both onroad and nonroad diesel fuel, and in the same timeframe
- Pleased EPA adopted outstanding program for onroad HDDs last month
- Seeking similar program for nonroad HDDs
- Let me first be very clear about what STAPPA and ALAPCO believe is the key principle upon which the next stage of nonroad HDD controls must be based
- That key principle is a SYSTEMS-BASED APPROACH to include NOT ONLY more stringent engine standards for NOx, PM and NMHC, BUT ALSO a nationwide cap on sulfur in nonroad diesel fuel of 15 ppm, identical to that which has just been set by EPA for onroad diesel fuel
- This systems-based approach is absolutely essential

- Control of nonroad HDDs as critical as control of onroad HDD diesel
- Nonroad HDDs are a large (larger than onroad) <u>and growing</u> source of air pollution
- They are responsible for substantial levels of NOx, a primary precursor to formation of ground-level ozone, which continues to pose an intractable national problem
- They also contribute significantly to high levels of coarse and fine particulate that exist in many areas across the country
- And they contribute to an array of other very significant environmental impacts, including regional haze, acid rain and global warming
- But perhaps the greatest threat from nonroad HDDs comes from their toxic emissions
- Diesel exhaust is a hazardous mix comprised of hundreds of different chemical compounds, over 40 of which are listed by EPA and California as toxic air contaminants, known human carcinogens, probable human carcinogens, reproductive toxicants and endocrine disrupters
- In 1998, California declared particulate emissions from diesel-fueled engines a toxic air contaminant, based on data that supported links between diesel exposure and cancer
- Dozens of other studies, as well as EPA's own health assessment document for diesel emissions, have also demonstrated a link between diesel exhaust and cancer
- Last spring, STAPPA and ALAPCO conducted study based on the South Coast Air Quality Management District's *Multiple Air Toxics Exposure Study in the South Coast Air Basin* (MATES-II)

- Our study sought to extrapolate the MATES-II evaluation of cancer risk from diesel particulate to other cities across the country and to estimate how many cancers nationwide are the result of exposure to diesel particulate
- By applying a tailored, more conservative version of the MATES-II methodology, we found that, on a nationwide basis, diesel particulate may be responsible for 125, 000 cancers over a lifetime
- This is not a precise number, nor is it intended to be
- Instead, it is an approximation of the potential national impact of exposure to diesel particulate that highlights the need for swift and certain regulatory action

- Setting a national 15-ppm cap on sulfur in diesel fuel will:
    - Decrease emissions of SO2, PM10, PM2.5, PM2.5 precursors and acid rain precursors from existing and future nonroad HDDs
    - Enable the use of currently available control technologies and newly emerging advanced technologies, thus facilitating reductions in ozone precursors and toxic air contaminants from new nonroad HDD vehicles and engines and potentially achieving further reductions in SO2, PM10, PM2.5, PM2.5 precursors and acid rain precursors
    - Facilitate significant opportunities to clean up existing nonroad vehicles and engines (retrofits)

- S&A firmly believe the technological advances to occur in order to meet the new onroad HDD standards will carry over to nonroad equipment, <u>but only</u> if very low-sulfur nonroad diesel fuel is available
- We urge an accelerated program development strategy for nonroad HDD engines and nonroad diesel fuel, so that we can more effectively reduce the huge air quality and public health problems posed by these sources
- We recommend nonroad HDD engine standards and a nonroad diesel fuel sulfur cap that are equivalent to those for onroad HDDs and in the same timeframe
- And we encourage the establishment of a strong and effective in-use compliance program – to include both manufacturer-based testing and federal testing – that will ensure that nonroad HDDs operate as cleanly in use as they do in certification tests
- To accomplish these important goals, we call upon EPA to use the 2001 nonroad HDD tech review as an opportunity to significantly strengthen the nonroad diesel control program and we look forward to participating in and contributing to that process