

October 23, 2007

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

Dear Administrator Johnson:

On behalf of the National Association of Clean Air Agencies (NACAA) . the association of air pollution control agencies in 53 states and territories and over 165 metropolitan areas across the country . we write to urge your immediate action, by not later than the end of this calendar year, to promulgate a final rule for the Control of Emissions of Air Pollution from Locomotive and Marine Compression Ignition Engines Less than 30 Liters per Cylinder. Moreover, we urge that such a final rule include the strengthening changes NACAA recommended to the agency earlier this year, in our testimony and written comments on this proposed rule.

NACAA is pleased that EPA is pursuing emission reductions from locomotive and marine diesel engines. However, given the substantial contributions of these engines to air quality problems nationwide, and the significant public health and welfare benefits that can result from comprehensive and timely controls, it is imperative that emission control requirements for locomotive and marine diesel engines achieve the greatest reductions feasible as soon as possible. Toward that end, we reiterate the key elements of our recommendations in this regard:

1. With respect to locomotives, we recommend that the implementation dates for new engine and remanufacture standards be accelerated in the final rule. In particular, the agency's proposed Tier 4 NO<sub>x</sub> (1.3 gram per brake horsepower hour) and PM (0.03 g/bhp-hr) standards for new engines are technologically feasible by the end of 2013, rather than the 2017 (PM) and 2015 (NO<sub>x</sub>) deadlines proposed in the rule. In addition, the Tier 3 PM standard (0.10 g/bhp-hr) for new locomotives can be implemented by no later than the end of 2010, rather than EPA's proposed 2012 date. NACAA urges EPA to accelerate these deadlines accordingly.
2. In addition, because locomotive engines have an extremely long operational life, we urge EPA to require stringent remanufacture requirements for the existing fleet. While NACAA supports the agency's proposed Tier 0 and Tier 1 remanufacture standards, EPA should accelerate the Tier 2 remanufacture standard for PM to be implemented by the end of 2010, rather than the 2013 proposed date.
3. For marine diesel engines, we support applying emissions standards not only to new engines, but to rebuilt/remanufactured engines, and encourage EPA to include such standards in the final rule for all Category 1 (C1) and Category 2 (C2) engines. For new marine diesels, we recommend that EPA expand the coverage of Tier 4 standards to include all new C1 and C2 engines greater than 25 horsepower and accelerate

implementation from 2013 to 2015 (depending on the engine's kW rating); Tier 3 implementation dates should also be accelerated, accordingly.

4. Finally, although this proposal does not address Category 3 marine engines, NACAA has long advocated for aggressive and swift regulation for these engines. Therefore, we reiterate our concern over this issue, and urge EPA to ensure that such controls be implemented expeditiously, either through an international protocol with the International Maritime Organization (IMO) or through U.S. regulation. We are encouraged by the U.S. proposal presented to the IMO this spring and urge that the agency seek prompt action by the IMO or propose meaningful U.S. regulations in a timely fashion.

Thank you for considering these recommendations. Once again, we note the critical importance of promulgating the final rule, including the aforementioned components, by no later than December 31, 2007. If you have any questions or desire additional information, please do not hesitate to contact either of us, or S. William Becker, Executive Director of NACAA.

Sincerely,



Nancy L. Seidman (Massachusetts)  
Co-Chair  
NACAA Mobile Sources and Fuels Committee



Dennis J. McLerran (Seattle, WA)  
Co-Chair  
NACAA Mobile Sources and Fuels Committee

cc: Robert Meyers, EPA OAR  
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