Concepts to Reduce Emissions from Locomotives and Railyards



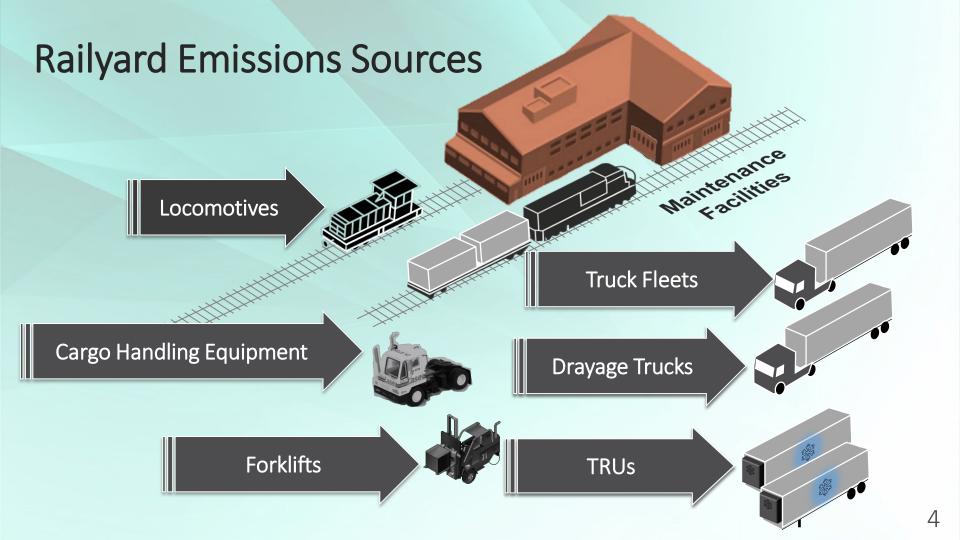
Meeting Agenda

- Introductions
- Background
- CARB Concepts
- South Coast Concepts
- Questions

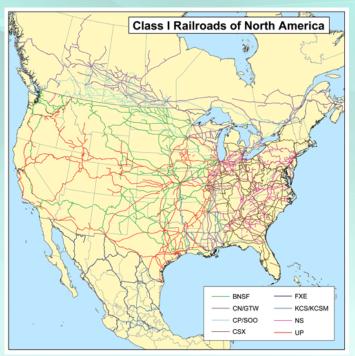


What do we need to minimize the community health impacts from locomotives?

- Engaged community partners
- Industry leadership
- Coordinated state and local government actions
- Multi-year incentive funding
- More stringent national standards



Line Haul Locomotives



- Large, high horsepower
- Travel throughout country
- Difficult to incentivize





Switchers



- Small, lower horsepower
- Typically older
- Generally stay local
- State incentives available





CARB Background on Rail

1998 South Coast Agreement (sunset 2030)

- Average Tier 2 NOx emissions standard
- Railroads report activity
- Credits provided for early technology adoption

2005 Statewide Railyard Agreement (sunset 2015)

- Idle reduction, repair and reporting effort
- Use of cleaner diesel fuel
- 17 railyard health risk assessments

South Coast AQMD – Rail Activities

• 2017

South Coast AQMD Board directed staff to develop a draft Indirect Source regulation on railyards, and explore voluntary approaches

• 2018/2019

Staff collected emission inventory information from UP/ BNSF

• 2019

All three year-1 AB617 communities identified railyards as a top priority (Commerce/E. LA, Wilmington/West Long Beach/Carson, San Bernardino)

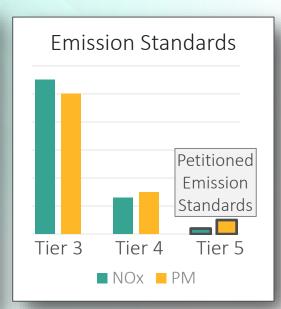
State of Locomotive Technology

• Tier 4 (2015)

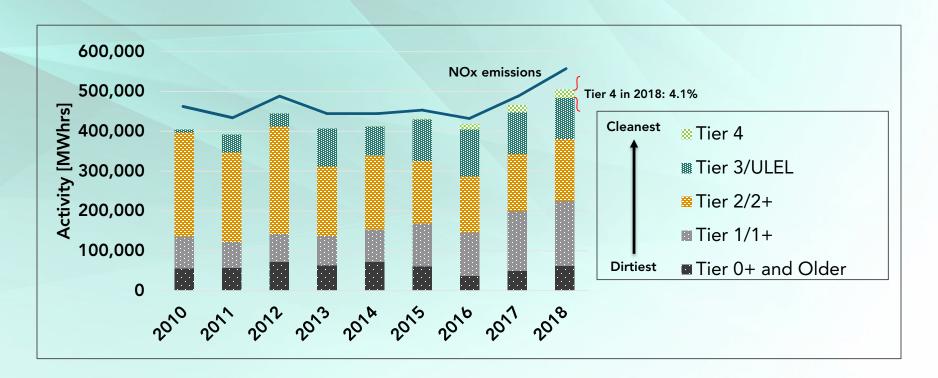
 Locomotive Petition to U.S. EPA

 Currently Demonstrating Batteries on Locomotives





Locomotive Emissions in the South Coast



Who Can do What?

Federal: U.S. Environmental Protection Agency

- Regulate locomotive emissions standards
- Stationary and Mobile
 Source Authority



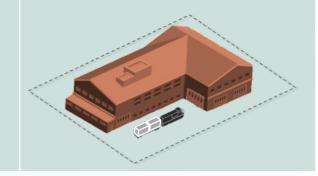
State: California Air Resources Board (CARB)

- Regulate locomotive activity
- Primarily Mobile Source
 Authority



Local: Air Quality Management Districts (SCAQMD)

- Regulate railyard emissions
- Primarily Stationary and Indirect Source Authority

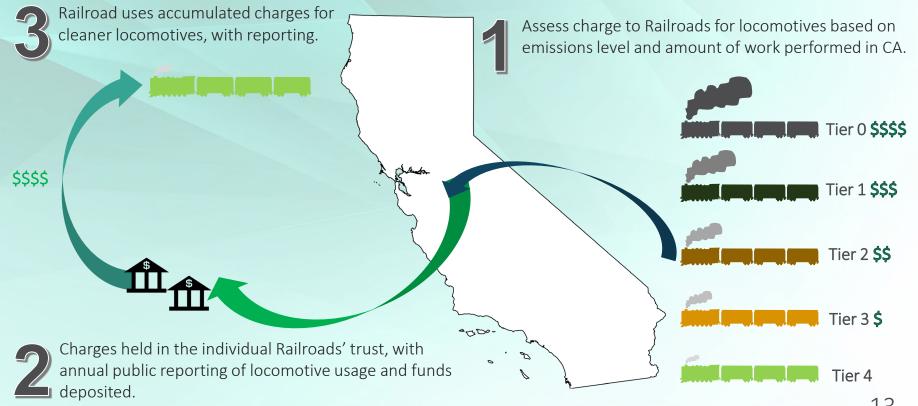


CARB Statewide Concepts

- Establish a Locomotive Emissions Reduction Spending Account
- In-Use Locomotive Remanufacture Limit

- Adopt U.S. EPA 30 Minute Idling Limit
- Genset Repurposing

1. Establish a Locomotive Emissions Reduction Spending Account



2. In-Use Locomotive Remanufacture Limit



- Railroads currently have no limit how many times they can remanufacture
 - Remanufacture only needs to be as-built or "plus" standard
- When implemented, any locomotive already remanufactured more than once would be banned from California
 - Alternative: remanufacture to Tier 4 and continue California operation

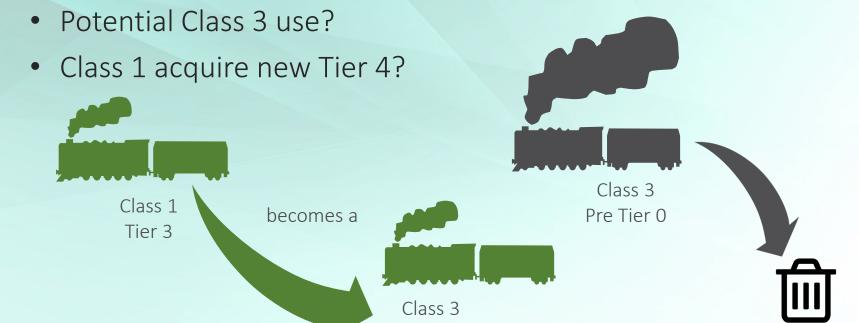
3. Adopt U.S. EPA 30 Minute Idling Limit

- Incorporates Federal requirements in California SIP
- Makes the rule CARB enforceable
- Enforcement by Air Districts possible through enforcement MOU



4. Genset Repurposing

- Tier 3 generator sets not fit for Class 1 use
- Class 3 operating much older, lower use locomotives



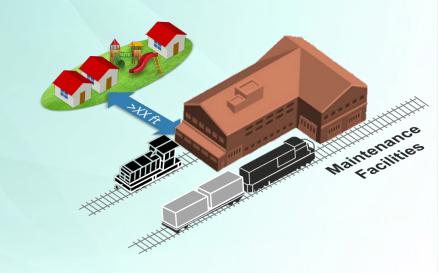
Tier 3

South Coast AQMD Concepts

- Indirect Source Rule (ISR) to Reduce Exposures from Locomotive Maintenance and Service Emissions
- ISR to Require Engineering Plans for Zero Emissions Operations
 - New Incentive Program Focused on Cleanest Locomotive Use
 - Evaluate New Monitoring Approaches for In-Use Locomotives

1. Reduce Exposures from Locomotive Maintenance and Service Emissions

- Community has placed high priority on reducing exposure from locomotive maintenance
 - In the past, the railroads have stated that >10,000 maintenance and service events per year have occurred at some railyards
 - Load testing and idling can have high emissions

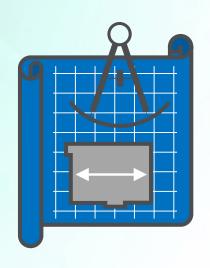


Proposed ISR Requirements

- → Minimum distances to sensitive receptors (buffer)
- → Install/Use emission control equipment
- → Schedule maintenance activities to reduce impacts

Engineering Plans for Zero Emissions Operations

- Community priority on zero emission on-site equipment
- For transition to Zero Emissions operations, significant infrastructure upgrades are needed
 - Land, electrical equipment, site-specific engineering, etc.
- Coordination with local utilities is critical



Proposed ISR Requirements

- → Railroads prepare site-specific Zero Emissions Plans
- → South Coast AQMD and CARB would evaluate plans to identify next steps (regulations, incentives, etc.)

3. New Incentive Program Focused on Cleanest Locomotive Use

- Current incentive programs have limited effectiveness in accelerating the widespread use of the cleanest locomotives (Tier 4)
 - Programs require <u>in-state use</u> and <u>replacement</u>
- Railroads have shown that preferential routing is possible with 1998 MOU Tier 2 requirement
- Attract cleanest existing locomotives now
 - Faster possible emission reductions than regulations
- Potentially funded by Railroads through proposed CARB spending account

Potential Approach

- → Develop new local program that provides incentives tied to clean locomotive use, not replacement
 - Increased incentives in disadvantaged communities

South Coast AQMD funded 19 freight locomotives since 2016 (~\$37 million total)

4. Evaluate New Monitoring Approaches for In-Use Locomotives

- South Coast AQMD continues to receive air quality complaints about smoking locomotives
 - We pass along the complaint to the railroads
- EPA sets emissions standards, but only requires in-use testing for up to five locomotives per railroad per year
- Better data on local air quality impacts of smoking locomotives can lead to follow-up actions/ priorities
- Potential document air quality impacts

Approach

→ Use data to support follow-up regulatory or enforcement actions to reduce emissions
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Path Forward on Freight

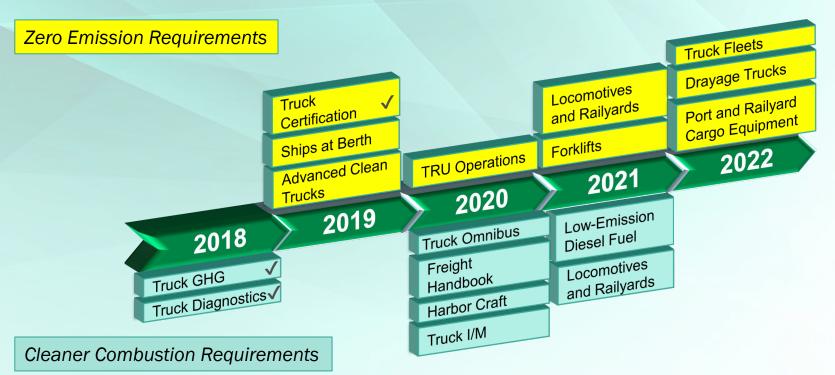


Next Steps

- Continue to reach out to stakeholders to develop concepts
- Continue to South Coast AQMD/CARB partnership
- CARB to hold additional workshops statewide
 - o Additional opportunities for public input will be available throughout rulemaking process
- South Coast AQMD Board considers Indirect Source Rule in December 2020
- Air Resources Board considers locomotive rules in 2021

New CARB Freight Actions

(1st Board hearing dates shown)



Last Updated 12/4/2019 24



Stakeholder Feedback



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