

WESTERN REGIONAL AIR PARTNERSHIP TESTIMONY FOR EPA PUBLIC HEARINGS  
ON PROPOSED RULEMAKING FOR NONROAD ENGINE AND FUEL STANDARDS

June 12, 2003  
Chicago, Illinois

Good morning. My name is Bob Neufeld and I thank you for this opportunity to comment on EPA's proposed rule for new nonroad engine and fuel standards. I am the Vice President for Environment and Governmental Relations of Wyoming Refining Company and serve as the Co-Chair of the Western Regional Air Partnership's (WRAP) Mobile Sources Forum. I am here today to provide some comments on behalf of the WRAP.

The WRAP is a collaborative effort of 13 Western states, Western tribes, federal agencies, environmental advocacy groups, and business interests working to implement EPA's regional haze regulations and address other regional air quality issues of concern to the West. The WRAP was formed as the successor organization to the Grand Canyon Visibility Transport Commission (GCVTC), which first began studying regional haze on the Colorado Plateau in 1991.

Research by the Grand Canyon Commission, the WRAP, and the EPA have consistently found that, due to a variety of pollution sources, visibility in the West is about one half the distance it would be under natural conditions. Emissions of fine particles, nitrogen oxides, and sulfur dioxide from nonroad engines are a significant contributor to regional haze in the West. The WRAP's analysis shows that in the absence of new federal standards, future emissions from nonroad sources will exceed emissions from onroad cars, trucks, and buses.

In January, the WRAP sent a letter to EPA Administrator Whitman encouraging the adoption of rigorous new engine and fuel sulfur standards for nonroad sources, similar in stringency to those already in place for onroad sources. The WRAP believes that this type of action by EPA is necessary if the West is to make reasonable progress towards improving visibility as required by the Clean Air Act and EPA's regional haze regulations. This action is also important to those areas of the West that are working to meet health-based air quality standards and reduce health risks associated with toxic air pollutants.

The WRAP appreciates the Agency's response to its January 2003 letter and is encouraged by EPA's proposed rule. The WRAP is undertaking a review of the proposal with the goal of providing specific, written comments by the close of the public comment period. Thank you for the opportunity to comment today. The WRAP looks forward to continuing to work with EPA on this important rulemaking.



# Western Regional Air Partnership

January 28, 2003

The Honorable Christine Todd Whitman  
Administrator  
U.S. Environmental Protection Agency (1101A)  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Dear Administrator Whitman:

On behalf of the Western Regional Air Partnership (WRAP), we are writing to encourage EPA's adoption of rigorous new engine and fuel sulfur standards for non-road diesel sources, such as those used in construction, mining, industrial, and farming equipment, as well as new fuel sulfur standards for locomotives and commercial marine vessels.

Last summer, EPA expressed its intent to propose these new standards, working cooperatively with the Office of Management and Budget (OMB). We urge EPA and OMB to expedite this proposal and suggest that the new non-road diesel engine and fuel sulfur standards be similar in stringency to those already in place for on-road diesel sources. This action is necessary if the West is to make reasonable progress toward improving visibility in our nation's Class I areas as required by the Clean Air Act and EPA's regional haze regulations. This action is also important for states striving to meet health-based air quality standards and will reduce significant health risks associated with toxic air pollutants emitted by non-road diesel engines in all states.

As you know, the WRAP is a collaborative effort of western tribes, western states, and federal agencies working with business and environmental interests to implement the recommendations of the Grand Canyon Visibility Transport Commission and develop the technical and policy tools needed by Western states and tribes to comply with EPA's regional haze regulations. The WRAP estimates that in the absence of new engine and fuel sulfur standards for non-road diesel sources, future emissions from non-road sources in the West will be significantly higher than those from on-road sources.

In addition to adopting these new standards, we strongly encourage EPA, working cooperatively with states and tribes, to continue and expand its efforts to reduce emissions from existing on-road and non-road diesel engines. Existing diesel engines will operate for many years before being replaced by engines meeting the new standards. We believe that states and tribes, working collaboratively with EPA, can design cost-effective retrofit programs resulting in substantial

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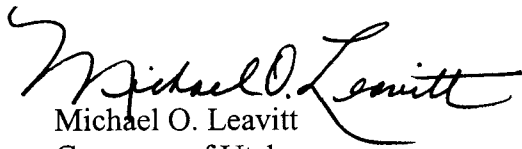
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The Honorable Christine Todd Whitman  
January 28, 2003  
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emission reductions from these sources. EPA staff have met with WRAP members over the last year and discussed a number of opportunities to collaborate on diesel retrofit programs, and we are very interested in pursuing these opportunities with EPA. Along these same lines, the WRAP suggests that EPA evaluate how it might use the forthcoming rules to achieve clean retrofits of large non-road engines when they are rebuilt.

Thank you for all of your efforts to improve our nation's air quality. The WRAP looks forward to commenting on EPA's proposed standards for non-road diesel sources and we pledge to work with you to ensure that the final rule effectively addresses this source category.

Sincerely,

  
Michael O. Leavitt  
Governor of Utah  
WRAP Co-Chair

  
Fred S. Vallo, Sr.  
Governor of Pueblo of Acoma  
WRAP Co-Chair

cc: John D. Graham, OMB  
Jeff Holmstead, EPA  
Margo Oge, EPA



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

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AIR AND RADIATION

The Honorable Michael O. Leavitt  
Governor of Utah  
Western Regional Air Partnership (WRAP) Co-Chair  
Western Governors' Association  
1515 Cleveland Place, Suite 200  
Denver, CO 80202

Dear Governor Leavitt:

Thank you for your letter of January 28, 2003, co-signed by Governor Vallo of the Pueblo of Acoma, in which you expressed the support of the Western Regional Air Partnership for the Environmental Protection Agency's (EPA) adoption of rigorous new standards for non-road diesel equipment. Although nonroad diesel equipment is currently regulated under existing standards, emissions from these sources currently are a significant part of the emissions inventory and will increase in coming years if action is not taken now. We believe that additional emission reductions are necessary to protect public health and meet our air quality goals.

My staff is currently developing a proposal for a program that would control emissions from these engines to levels comparable to those achieved by new automobiles today. Our plan is to follow the systems approach applied in EPA's new regulations for highway diesel and gasoline vehicles, in which we established coordinated standards for engines and fuel. The emission reductions accomplished through this approach far exceed those achieved by separate engine and fuel programs, and in a very cost-effective manner.

As you mentioned in your letter, it is critical that we also address emissions from existing non-road and on-road equipment. EPA will continue to work with state, local, and tribal governments to implement diesel retrofit programs. This combined approach will provide major emission reductions from the non-road sector, which will go a long ways towards enabling communities across the nation to meet their clean air goals.

Again, thank you for your letter of support.

Sincerely,

A handwritten signature in black ink that reads "J. R. Holmstead (for)".

Jeffrey R. Holmstead  
Assistant Administrator