

EMA Comments on Emissions Inventory for Mobile Sources

**Subject:** EMA Comments on Emissions Inventory for Mobile Sources**From:** "Suchecki, Joe" <jsuchecki@emamail.org>**Date:** Wed, 05 Dec 2007 12:34:06 -0600**To:** wtasat@arb.ca.gov

CC ei07

07-12-07

Mr. Webster Tasat  
Manager, Emission Inventory Analysis Section  
California EPA

December 5, 2007

Dear Mr. Tasat:

EMA has been evaluating the methods ARB has used to estimate greenhouse gases from heavy-duty on-road diesel vehicles in the recent ARB report "California 1990 Greenhouse Gas Emission Level and 2020 Emissions Limit", November 16, 2007. We note from the documentation that fuel-specific emission rates for CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub> (that is, emissions in g/gallon of fuel consumed) were estimated from the EMFAC2007 model.

Our evaluation of the methods in EMFAC2007, while not yet complete, indicates that the methods used in EMFAC2007 appear to be mostly appropriate. However, one assumption made in EMFAC is that CO<sub>2</sub> emissions have not changed for Class 8 vehicles. We think this assumption is in error, and that there have been improvements in CO<sub>2</sub> emissions from Class 8 vehicles.

The error in this assumption may not affect the 1990 emissions from Class 8 vehicles, but it would affect CO<sub>2</sub> emission estimates made for 2004 or 2020 (the report contains a preliminary estimate of 2004 - see Table 3 in the report).

We will share the results of our analysis with you when it is completed. We look forward to working with ARB staff on this important matter.

Very truly yours,

Joe Suchecki

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