

SCAQMD Staff Comments on the Update to On-Road and Off-Road Emissions Inventories

Agenda Item No. 10-10-9

California Air Resources Board Meeting
Sacramento, CA

November 18, 2010

Areas of Uncertainty

- Off-Road Emissions Inventory
 - *Annual Fuel Use (Range 150 to 250 million/yr)*
 - *Load Factor Assumptions
(Assumed 33% Decrease Over All Vehicles)*
 - *Population (Percentage Non-reporting)*
 - *Hours of Use/Economic Recession/Growth Forecasts*
 - *Allocation by Region*
- On-Road Emissions Inventory
 - *Allocation by Region*
 - *Growth Forecasts*

SCAQMD Staff Review

- Greater Uncertainties Associated with Off-Road Emissions Estimates
- Conducted Sensitivity Analysis within Uncertainty Bounds Provided by ARB Staff
- Assumption of 33% Lower Load Factor Across All Off-Road Categories May Not Be Appropriate
- Growth Forecast for On-Road Truck Emissions Reasonable (Similar to Port of LA/Long Beach Forecasts)
- Off-Road Emissions May Be 20% to 30% Higher

Implication of Lower Emissions Estimates

| South Coast | | 2007 SIP | Adopted Regulations | Proposed Amendments | Proposed Amendments with Upper Bound on Off-Road Inventory |
|----------------------------------|-------|----------|---------------------|---------------------|--|
| Off-Road | NOX | 85.6 | 24.9 | 27.6 | 33 |
| | PM2.5 | 2.3 | 0.9 | 1.3 | 1.5 |
| Trucks | NOX | 55.1 | 81.5 | 117.6 | 117.6 |
| | PM2.5 | 2.3 | 0.9 | 2.1 | 2.1 |
| NOX Eq (pm*10) | | 186.7 | 124.4 | 179.3 | 186.6 |
| Margin without Credit Provisions | | | 62.0 | 7.4 | 0 |
| Margin with Credit Provisions | | | n/a | 4.6 | -2.8 |

Summary

- Current Off-Road Emission Estimates May Be on the Low Side
- Need for Adequate Review of Emission Inventory Changes
- Conduct Additional Analysis to Further Understand Impacts of Individual Factors
- Even Though Reductions Not Needed for 2015 Based on Inventory and Ambient Air Quality Measurements, Still Need Originally Anticipated Controls Shortly Thereafter
- Need to Further Incentivize Vehicle Clean Up as Early as Possible

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