Cost of Rule 4 to 8+ Times Higher Than Expected

Regulation or ATCM	Diesel PM Cost-Effectiveness (dollars/pound PM)	Comments
TRU ATCM 2011(EPA/4-mode) 7-Year Operational Life	\$118-\$222	25-60% less PM by using 4-mode data. Likely cost of rule.
Ocean Going Vessels at Berth	\$173	
Public Fleets Rule	\$159	
TRU ATCM 2011 (Staff/8-Mode) 7-Year Operational Life	<u>\$88</u>	Current Staff Recommendation
Truck and Bus Rule	\$46	
In-Use Off Road Diesel Rule	\$40	
Solid Waste Collection Vehicle	\$32	
Cargo Handling ATCM	\$21	
TRU ATCM 2003 7-Year Operational Life	\$ 10-20	Original 2003 Cost Estimate

ARB Can Meet 2003 Emission Reduction Goals And Save California Millions of Dollars

Regulation or ATCM	Diesel PM Cost- Effectiveness (dollars/pound PM)	Comments
Ocean Going Vessels at Berth	\$173	-
Public Fleets Rule	\$159	
TRU ATCM 2011 (Staff/8-Mode) 7-Year Operational Life	\$88	Achieves SIP
TRU ATCM 2011 8-Year Operational Life	\$ 52	Saves \$270,000,000: Achieves SIP
Truck and Bus Rule	\$46	
In-Use Off Road Diesel Rule	\$40	
Solid Waste Collection Vehicle	\$32	
TRU ATCM 2011 9-Year Operational Life	\$27	CTA Recommended Operational Life Saves \$430,000,000: Achieves SIP
Cargo Handling ATCM	\$21	
TRU ATCM 2003	\$10-20	•
TRU ATCM 2011 10-Year Operational Life	\$9	10 Year Operational Life Saves \$530,000,000

9 Year Operational Life: Achieves Environmental-Economic Balance

- 9 Year Operational Life Exceeds Original PM Reduction Goal
- 9-Year vs. 7-Year Operational Life:
 Saves \$430,000,000, Adjusts Statewide PM 0.02%
- Allows "One and Done" OEM Compliance Option to Come to Market (Tier 4 Final Engine due last quarter of 2013)
- Allows time for additional ULETRU retrofit field testing
 - Better retrofit reliability helps avoid Food Safety/Spoilage issues

Best Available Compromise to Fix Issues With TRU ATCM