

**OFFROAD Modeling Change Technical Memo**

**SUBJECT:** Changes to the Locomotive Inventory

**LEAD:** Walter Wong

**Summary**

The statewide locomotive emission inventory has not been updated since 2002. Using the Booz-Allen Hamilton’s (BAH) study (Locomotive Emission Study) published in 1992 as a guideline (summary of inventory methodology can be found in Appendix A), staff updated the locomotive inventory.

The history of locomotive emission inventory updates began in 1992 using the results from the BAH report as the baseline inventory. In 2003, staff began updating the emissions inventory by revising the growth assumptions used in the inventory. The revised growth factors were incorporated into the ARB’s 2003 Almanac Emission Inventory. With additional data, staff is proposing further update to the locomotive inventory to incorporate fuel correction factors, add passenger train data and Class III locomotives. Changes from updated locomotive activity data have made a significant impact on the total inventory (see Table 1).

Table 1. Impact of Changes on Statewide Locomotive Inventory

Year	Pre 2003 ARB Almanac Inventory (tons/day)			Revised Inventory (tons/day)			Difference (tons/day)		
	HC	NOx	PM	HC	NOx	PM	HC	NOx	PM
1987	7.2	158.8	3.6	7.2	158.8	3.6	0.0	0.0	0.0
2000	7.2	144.8	2.8	9.8	207.2	4.7	2.6	62.4	1.9
2010	7.2	77.8	2.8	9.5	131.9	4.2	2.3	54.1	1.4
2020	7.2	77.8	2.8	9.4	134.6	4.1	2.2	56.8	1.3

**Reasons For Change**

During the 2003 South Coast’s State Implementation Plan (SIP) development process, industry consultants approached Air Resources Board (ARB) staff to refine the locomotive emissions inventory. Specifically, their concerns were related to the growth factors and fuel correction factors used in the inventory

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calculations. This document outlines how the locomotive emissions inventory was updated and the subsequent changes made to address industry's concerns.

### **Background : Baseline 1987 Locomotive Emissions Inventory (BAH report)**

Locomotive operations can be characterized by the type of service performed. For emission inventory purposes, locomotives are classified into five different service types as defined in BAH's report.

Line-haul/intermodal – Intermodal locomotives generally operate at higher speeds and with higher power than other types and incorporate modern, high-speed engines.

Mixed/bulk – Mixed locomotives are the most common and operate with a wide range of power. They also perform line-haul duties.

Local/Short Haul – Local locomotives perform services that are a mixture of mixed freight and yard service. They operate with lower power and use older horsepower engines.

Yard/Switcher – Yard operations are used in switching locomotives and characterized by stop and start type movements. They operate with smaller engines and have the oldest locomotive engines.

Passenger – Passenger locomotives are generally high speed line haul type operations.

Categories of railroads are further explained by a precise revenue-based definition found in the regulations of the Surface Transportation Board (STB). Rail carriers are grouped into three classes for the purposes of accounting and reporting:

Class I – Carriers with annual operating revenues of \$250 million or more

Class II – Carriers with annual operating revenues of less than \$250 million but in excess of \$20 million

Class III – Carriers with annual operating revenues of less than \$20 million or less, and all switching companies regardless of operating revenues.

The threshold figures are adjusted annually for inflation using the base year of 1991.

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The 1987 locomotive inventory as shown in Table 2 is taken from the BAH report prepared for the ARB entitled “Locomotive Emission Study” completed in 1992 (<http://www.arb.ca.gov/app/library/libcc.php>). Information was gathered from many sources including ARB, the South Coast Air Quality Management District, the California Energy Commission, the Association of American Railroads (AAR), locomotive and large engine manufacturers, and Southwest Research Institute. Railroad companies, such as Southern Pacific, Union Pacific, and Atchison, Topeka and Santa Fe (ATSF), provided emission factors, train operation data, and throttle position profiles for trains operating in their respective territories. Southwest Research Institute provided emission test data.

Table 2. 1987 Locomotive Inventory in Tons Per Day, Statewide, BAH report

TYPE	HC	CO	NOX	PM	SOX
Line-Haul/Intermodal	3.97	12.89	86.21	1.97	6.36
Short-Haul/Local	0.96	3.06	21.30	0.46	1.59
Mixed	1.51	4.85	37.34	0.81	2.76
Passenger	0.10	0.22	3.24	0.07	0.30
Yard/Switcher	0.62	1.57	10.69	0.24	0.58
Total	7.16	22.59	158.78	3.55	11.59

The assumed average fuel sulfur content is 2700 parts per million (ppm) obtained from the BAH report.

### **Current Growth Estimates**

Prior to the 2003 South Coast SIP update, growth factors were based on employment data in the railroad industry. Staff believes that the use of historic employment data, which translates to a decline in emissions in future years, may be masking actual positive growth in locomotive operations. It may be assumed that the number of employees is declining due to increased efficiency.

### **Changes to the Locomotive Inventory**

#### **Summary of Growth in Emission Based on BAH Report**

Growth is estimated based on train operation type and by several operating characteristics.

Increased Rail Lube and Aerodynamics – this arises from reduction in friction and will help reduce power requirements.

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Introduction of New Locomotives – older locomotive units will be replaced by newer models.

Changes in Traffic Level – the increase or decrease in railroad activity

In the BAH report, projected emission estimates for years 2000 and 2010 were based on the factors shown in Tables 3 and 4. A substantial part of the locomotive emission inventory forecast is based upon projections of rail traffic levels. BAH projected future rail traffic level as a function of population and economic growth in the state. BAH also projected growth in emission only to 2010.

Table 3. Changes in Emissions from 1987-2000 (Exhibit 4 p. 11 of the 8/92 Locomotive Emission Study Supplement) (1987 Base Year)

Train Operation Type	Increased Rail Lube and Aerodynamics	Introduction of New Locomotive	Changes in Traffic Levels	Cumulative Net Growth in Emissions
Intermodal	-7.0%	-8.0%	17.0%	2.0%
Mixed & Bulk	-7.0%	-8.0%	2.0%	-13.0%
Local	-3.0%	-3.0%	-2.0%	-8.0%
Yard	0.0%	-1.0%	-25.0%	-26.0%
Passenger	-7.0%	-8.0%	10.0%	-5.0%

Table 4. Changes in Emissions from 2001-2010 (Exhibit 4 p. 11 of the 8/92 Locomotive Emission Study Supplement) (2000 Base Year)

Train Operation Type	Increased Rail Lube and Aerodynamics	Improved Dispatching and Train Control	Introduction of New Locomotive	Changes in Traffic Levels	Cumulative Net Growth in Emissions
Intermodal	-2.0%	-3.0%	-8.0%	25.0%	12.0%
Mixed & Bulk	-2.0%	-3.0%	-8.0%	0.0%	-13.0%
Local	-1.0%	0.0%	-12.0%	-10.0%	-23.0%
Yard	0.0%	0.0%	-10.0%	-15.0%	-25.0%
Passenger	-2.0%	-3.0%	-8.0%	15.0%	2.0%

BAH added “Improved Dispatching and Train Control” to differentiate these impacts from the “Increased Rail Lubing” which helps to improve fuel efficiency from locomotive engines. Since train control techniques are emerging from the

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signal company research work, these assumed changes will not impact emission until year 2000.

Based on industry's input, staff recommends several changes to the locomotive emissions inventory. These include modifying growth factors, making adjustments to control factors reflecting the U. S. EPA regulations that went into effect in year 2000, incorporating fuel correction factors, adding smaller class III railroad and industrial locomotive, and updating passenger data.

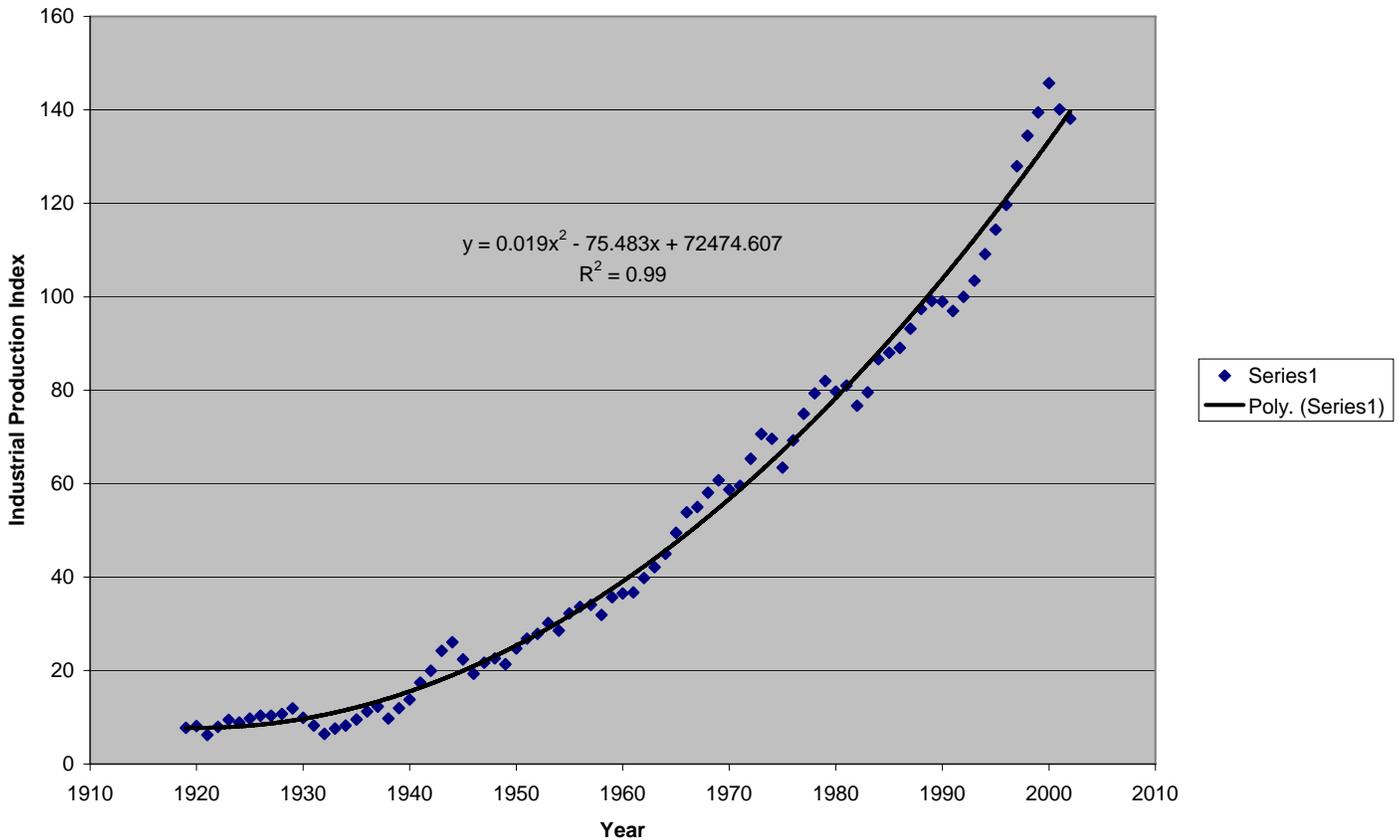
### **Revised Growth in Emissions**

Staff revised the growth factors for locomotives based on new data that better reflect locomotive operations. This includes U.S. industrial production and various railroad statistics available from the AAR.

Based on historic data recently obtained from U.S. industrial productions and the AAR, the changes in traffic levels were revised. A better estimate for changes in traffic levels for locomotives can be made to the line-haul class of railroad, which are the intermodal and mixed and bulk type of locomotives, using industrial production and AAR's data.

Industrial production data is considered to be a surrogate for changes in traffic levels of the line-haul locomotive. It is assumed that railroad activity would increase in order to accommodate the need to move more product. Industrial production is the total output of U.S. factories and mines, and is a key economic indicator released monthly by the Federal Reserve Board. U.S. industrial production historical data from 1920 to 2002 was obtained and analyzed from government sources. Figure 1 shows the historical industrial production trend (Source : <http://www.research.stlouisfed.org/fred2/series/INDPRO/3/Max>). Statistical analysis was used to derive a polynomial equation to fit the data.

Figure 1. Long-term Industrial Production



Another surrogate for growth is net ton-miles per engine. Consequently, staff analyzed railroad data from the AAR's Railroad Facts booklet (2001 edition). The booklet contains line-haul railroad statistics including financial status, operation and employment data, and usage profiles. Revenue ton-mile and locomotives in service data from the booklet were used to compute the net ton-miles per engine as shown in Table 5.

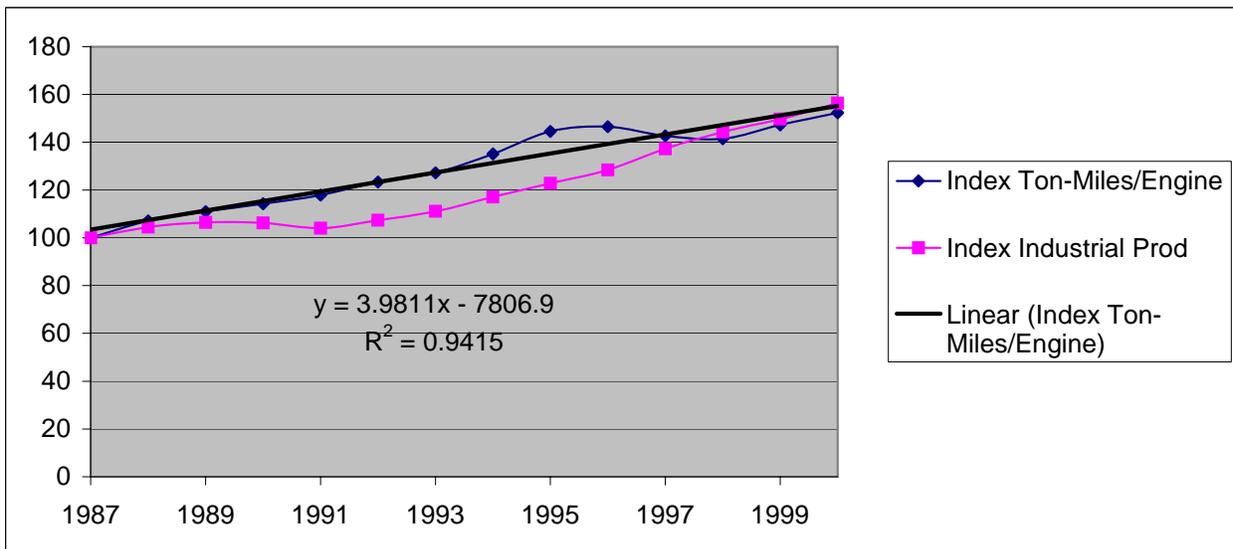
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Table 5. Revenue Ton-Miles and Ton-Miles/Engine (AAR Railroad Facts 2001 edition)

Year	Locomotive Diesel in Service (US)	Revenue Ton-Miles	Ton-Miles/Engine
1987	19,647	943,747	48.04
1988	19,364	996,182	51.45
1989	19,015	1,013,841	53.32
1990	18,835	1,033,969	54.90
1991	18,344	1,038,875	56.63
1992	18,004	1,066,781	59.25
1993	18,161	1,109,309	61.08
1994	18,496	1,200,701	64.92
1995	18,810	1,305,688	69.41
1996	19,267	1,355,975	70.38
1997	19,682	1,348,926	68.54
1998	20,259	1,376,802	67.96
1999	20,254	1,433,461	70.77
2000	20,026	1,465,960	73.20

As shown in Figure 2, there is a relatively good correlation between net ton-miles per engine growth and industrial production. Because net ton-miles per engine data are compiled by the railroad industry and pertains directly to the railroad segment, staff believes that net ton-miles per engine will better characterize future traffic level changes.

Figure 2. Ton-miles/Engine vs. Industrial Production (index base year = 1987)



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The ton-miles/engine data were projected to calculate the future growth rate of traffic level using a linear equation.

Staff also made changes to the “Increased Rail Lube and Aerodynamics” assumption shown in Tables 3 and 4. Rail lubing does not benefit the idling portion of locomotive activity. Since idling contributes 20% of the weighting in the line-haul duty cycle, staff reduced the rail lubing benefit by 20%. Meanwhile, improved dispatching and train control is assumed only to reduce engine idling. Therefore, staff reduced the improved dispatching benefit by 80%.

The benefit of the introduction of new locomotives to the fleet was decreased from the original BAH assumption. BAH assumed 50% penetration of the new engines by 2000. Literature research suggests that the new engines accounted for only about 34% of the fleet in 2000 ([www.railwatch.com](http://www.railwatch.com), <http://utahrails.net/all-time/modern-index.php>). These new engines are assumed to be 15% cleaner. Therefore, the benefit from new locomotive engines has been reduced to 5% (34% x 15% = 5% reduction).

Tables 6, 7, and 8 present the revised growth factors to be used to project the baseline (1987) locomotive emissions inventory into the future.

Table 6. ARB Revised Growth 1987-2000, ARB’s 2003 Almanac Emission Inventory

Train Operation Type	Increased Rail Lube and Aerodynamics	Introduction of New Locos	Population Increase	Changes in Traffic Levels	Cumulative Net Growth in Emissions	Annual Growth
Intermodal	-5.6%	-5.1%	1.9%	50.0%	41.2%	2.69%
Mixed & Bulk	-5.6%	-5.1%	1.9%	50.0%	41.2%	2.69%
Local	-2.4%	0%	0%	-2.0%	-4.4%	-0.35%
Yard	0.0%	0%	0%	-25.0%	-25.0%	-2.19%
Passenger	-5.6%	0%	1.9%	10.0%	6.3%	0.47%

The benefit of new locomotives with cleaner burning engines is accounted for in the control factor from EPA’s regulation beginning in 2001, which takes into account introduction of new locomotive engines meeting Tier I and Tier II standards.

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Table 7. ARB Revised Growth 2001-2010 (2000 Base Year, ARB's 2003 Almanac Emission Inventory)

Train Operation Type	Increased Rail Lube and Aerodynamics	Improved Dispatching and Train Control	Changes in Traffic Levels	Cumulative Net Growth in Emissions	Annual Growth
Intermodal	-1.6%	-0.6%	22.5%	20.3%	1.87%
Mixed & Bulk	-1.6%	-0.6%	22.5%	20.3%	1.87%
Local	-0.8%	-0.6%	-10.0%	-11.4%	-1.20%
Yard	0.0%	0.0%	-15.0%	-15.0%	-1.61%
Passenger	-1.6%	0.0%	15.0%	13.4%	1.27%

Table 8. ARB Revised Growth 2010-2020 (2010 Base Year, ARB's 2003 Almanac Emission Inventory)

Train Operation Type	Increased Rail Lube and Aerodynamics	Improved Dispatching and Train Control	Changes in Traffic Levels	Cumulative Net Growth	Annual Growth
Intermodal	0.0%	0.0%	18.0%	18.0%	1.67%
Mixed & Bulk	0.0%	0.0%	18.0%	18.0%	1.67%
Local	0.0%	0.0%	0.0%	0.0%	0.00%
Yard	0.0%	0.0%	0.0%	0.0%	0.00%
Passenger	0.0%	0.0%	0.0%	0.0%	0.00%

In Table 8, staff assumes no benefit from aerodynamics and improved train controls. Staff seeks guidance from industry as to their input regarding future benefits.

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Table 9. Revised Growth in Emissions (Base Year 1987)

Year	Intermodal	Mixed & Bulk	Local	Yard	Passenger
1987	1.00	1.00	1.00	1.00	1.00
1988	1.03	1.03	1.00	0.98	1.00
1989	1.05	1.05	0.99	0.96	1.01
1990	1.08	1.08	0.99	0.94	1.01
1991	1.11	1.11	0.99	0.92	1.02
1992	1.14	1.14	0.98	0.90	1.02
1993	1.17	1.17	0.98	0.88	1.03
1994	1.20	1.20	0.98	0.86	1.03
1995	1.24	1.24	0.97	0.84	1.04
1996	1.27	1.27	0.97	0.82	1.04
1997	1.30	1.30	0.97	0.80	1.05
1998	1.34	1.34	0.96	0.78	1.05
1999	1.38	1.38	0.96	0.77	1.06
2000	1.41	1.41	0.96	0.75	1.06
2001	1.44	1.44	0.94	0.74	1.08
2002	1.47	1.47	0.93	0.73	1.09
2003	1.49	1.49	0.92	0.71	1.10
2004	1.52	1.52	0.91	0.70	1.12
2005	1.55	1.55	0.90	0.69	1.13
2006	1.58	1.58	0.89	0.68	1.15
2007	1.61	1.61	0.88	0.67	1.16
2008	1.64	1.64	0.87	0.66	1.18
2009	1.67	1.67	0.86	0.65	1.19
2010	1.70	1.70	0.85	0.64	1.21
2011	1.73	1.73	0.85	0.64	1.21
2012	1.76	1.76	0.85	0.64	1.21
2013	1.79	1.79	0.85	0.64	1.21
2014	1.81	1.81	0.85	0.64	1.21
2015	1.85	1.85	0.85	0.64	1.21
2016	1.88	1.88	0.85	0.64	1.21
2017	1.91	1.91	0.85	0.64	1.21
2018	1.94	1.94	0.85	0.64	1.21
2019	1.97	1.97	0.85	0.64	1.21
2020	2.00	2.00	0.85	0.64	1.21

**Control Factors for U.S. EPA regulation**

In December 1997, the U.S. EPA finalized the locomotive emission standard regulation. The regulatory support document lists the control factors used (<http://www.epa.gov/otaq/regs/nonroad/locomotv/frm/locorsd.pdf>). Staff modified the control factors to incorporate the existing memorandum of understanding (<http://www.arb.ca.gov/msprog/offroad/loco/loco.htm>) between the South Coast AQMD and the railroads that operate in the region. Previously, one control factor was applied statewide. In the revised emissions inventory starting in 2010, a lower control factor reflecting the introduction of lower emitting locomotive

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engines in the SCAB region was applied. Tables 10 and 11 show the revised control factors. Road hauling definition as used by U.S. EPA applies to the line-haul/intermodal, mixed, and local/short haul train type in the emissions inventory.

Table 10. Revised Statewide Control Factors

Year	State Road Hauling HC	State Road Hauling NOx	State Road Hauling PM	State Switcher HC	State Switcher NOx	State Switcher PM	State Passenger HC	State Passenger NOx	State Passenger PM
1999	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2000	1.00	0.99	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2001	1.00	0.95	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2002	1.00	0.88	1.00	1.00	0.98	1.00	1.00	0.98	1.00
2003	1.00	0.82	1.00	1.00	0.97	1.00	1.00	0.96	1.00
2004	1.00	0.75	1.00	1.00	0.95	1.00	1.00	0.94	1.00
2005	0.96	0.68	0.96	0.99	0.93	0.99	0.98	0.92	0.98
2006	0.92	0.62	0.92	0.99	0.91	0.99	0.96	0.90	0.96
2007	0.89	0.59	0.89	0.98	0.89	0.98	0.94	0.83	0.94
2008	0.87	0.57	0.86	0.98	0.87	0.97	0.92	0.76	0.92
2009	0.84	0.55	0.84	0.97	0.85	0.97	0.91	0.69	0.90
2010	0.82	0.54	0.81	0.96	0.83	0.96	0.89	0.62	0.88
2011	0.81	0.53	0.80	0.96	0.81	0.95	0.87	0.57	0.87
2012	0.80	0.53	0.79	0.95	0.79	0.94	0.85	0.56	0.85
2013	0.79	0.52	0.78	0.94	0.77	0.93	0.83	0.54	0.83
2014	0.77	0.51	0.76	0.94	0.75	0.93	0.82	0.53	0.81
2015	0.76	0.50	0.75	0.93	0.73	0.92	0.80	0.52	0.79
2016	0.75	0.50	0.74	0.92	0.71	0.91	0.78	0.51	0.77
2017	0.74	0.49	0.72	0.91	0.70	0.90	0.76	0.50	0.75
2018	0.73	0.48	0.71	0.90	0.69	0.89	0.74	0.49	0.73
2019	0.71	0.48	0.70	0.89	0.68	0.88	0.73	0.48	0.71
2020+	0.70	0.47	0.69	0.89	0.67	0.87	0.71	0.47	0.69

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Table 11. Revised SCAB Control Factors

Year	SCAB Road Hauling HC	SCAB Road Hauling NOx	SCAB Road Hauling PM	SCAB Switcher HC	SCAB Switcher NOx	SCAB Switcher PM
1999	1.00	1.00	1.00	1.00	1.00	1.00
2000	1.00	0.99	1.00	1.00	1.00	1.00
2001	1.00	0.95	1.00	1.00	1.00	1.00
2002	1.00	0.88	1.00	1.00	0.98	1.00
2003	1.00	0.82	1.00	1.00	0.97	1.00
2004	1.00	0.75	1.00	1.00	0.95	1.00
2005	0.96	0.68	0.96	0.99	0.93	0.99
2006	0.92	0.62	0.92	0.99	0.91	0.99
2007	0.89	0.59	0.89	0.98	0.89	0.98
2008	0.87	0.57	0.86	0.98	0.87	0.97
2009	0.84	0.55	0.84	0.97	0.85	0.97
2010	0.82	0.36	0.81	0.96	0.36	0.96
2011	0.81	0.36	0.80	0.96	0.36	0.95
2012	0.80	0.36	0.79	0.95	0.36	0.94
2013	0.79	0.36	0.78	0.94	0.36	0.93
2014	0.77	0.36	0.76	0.94	0.36	0.93
2015	0.76	0.36	0.75	0.93	0.36	0.92
2016	0.75	0.36	0.74	0.92	0.36	0.91
2017	0.74	0.36	0.72	0.91	0.36	0.90
2018	0.73	0.36	0.71	0.90	0.36	0.89
2019	0.71	0.36	0.70	0.89	0.36	0.88
2020+	0.70	0.36	0.69	0.89	0.36	0.87

**Addition of Class III Locomotive and Industrial/Military Locomotive**

The annual hours operated by the class III railroads are shown in Table 12. The results were tabulated from ARB Stationary Source Division's (SSD) survey (<http://www.arb.ca.gov/regact/carblohc/carblohc.htm>) conducted to support regulation with regards to ARB ultra-clean diesel fuel.

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Table 12. Short-Haul and Switcher Annual Hours for Class III Railroads

Air Basin	Operations	Population	Annual Hours Operated
Mountain Counties	SW	2	10214
Mojave Desert	L	10	27440
North Coast	L	3	5700
North Central Coast	L	1	1332
	SW	3	3996
Northeast Plateau	L	5	9892
South Coast	SW	21	75379
South Central Coast	L	5	3200
San Diego	L	4	5000
San Francisco	L	8	31600
	SW	4	5059
San Joaquin Valley	L	29	68780
	SW	19	72248
Sacramento Valley	L	6	11400
<b>Total</b>		<b>120</b>	<b>331240</b>

L = local short-haul, SW = switcher

The short-haul and switcher emission rate are derived from BAH report. The report cites studies from testing done at EPA and Southwest Research Institute.

Table 13. Short-Haul and Switcher Emission Rate

Emission Rate	Short-Haul (g/bhp-hr)	Switcher (g/bhp-hr)
HC	0.38	0.44
CO	1.61	1.45
NOx	12.86	15.82
PM	0.26	0.28
SOx	0.89	0.90
Fuel Rate (lb/hr)	120.00	60.00

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Table 14. Statewide Summary of Industrial Locomotives

Air Basin	Number of Locomotives	Avg. HP	Avg. Age
Mojave Desert	9	1,138	56
Others	11	587	54
San Francisco	11	525	54
San Joaquin Valley	38	1,176	54
South Coast	24	1,290	55
TOTALS	93	1,055	55

Table 15. Statewide Summary of Military Locomotives

Air Basin	Number of Locomotives	Avg. HP	Avg. Age
Mojave Desert	7	900	50
Northeast Plateau	2	1,850	50
Sacramento Valley	1	500	50
San Diego	7	835	50
San Francisco	4	1525	47.5
San Joaquin Valley	2	400	50
South Central Coast	1	500	50
TOTALS	24	930	49.6

The data from the survey provides a reasonable depiction of railroad activities in 2003. To forecast and backcast, an assumption was made to keep the data constant and have no growth. More research is needed to quantify the growth projections of smaller, local railroad activities.

**Update to Passenger Trains**

ARB's survey of intrastate locomotives included passenger agency trains that operated within the state. Staff attempted to reconcile the survey results by calculating the operation schedules posted by the operating agency to obtain hours of operation and mileage information. The results of the survey and calculated operating hours were comparable. Table 16 lists the calculated annual hours operated and miles traveled used to estimate emissions.

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Table 16. Passenger Trains Annual Miles and Hours

Air Basin	Annual Miles Operated	Annual Hours Operated
South Coast	3,700,795	92,392
South Central Coast	151,864	4,020
San Diego	914,893	25,278
San Francisco	2,578,862	77,944
San Joaquin Valley	674,824	17,313
Sacramento Valley	635,384	20,058
Total	8,656,621	237,006

The passenger train emission rate is derived from testing done at SWRI on several passenger locomotives.

Table 17. Passenger Train Emission Rate

Emission Rate	Passenger Train (g/bhp-hr)
HC	0.50
CO	0.69
Nox	12.83
PM	0.36
Sox	0.90
Fuel Rate (lb/hr)	455.00

**Fuel Correction Factors**

Aromatics

Previous studies quantifying the effects of lowering aromatic content are listed in Table 18. These studies tested four-stroke heavy-duty diesel engines (HDD). Although staff would have preferred to analyze data from tests performed on various locomotive engines to determine the effects of lower aromatics, these HDD tests are the best available resources to determine the fuel corrections factors due to lower aromatics.

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Table 18. Effect of Lowering Aromatic Volume on PM Emission

STUDY	Sulfur (ppm)	Aromatics (Volume %)	PM Reduction (%)
Chevron (1984)	2,800	31	Baseline
Chevron (1984)	500	31	23.8
Chevron (1984)	500	20	32.2
Chevron (1984)	500	15	36.0
Chevron (1984)	500	10	39.9
CRC-SWRI (1988)	500	31	Baseline
CRC-SWRI (1988)	500	20	9
CRC-SWRI (1988)	500	15	13
CRC-SWRI (1988)	500	10	17

Source : <http://www.arb.ca.gov/fuels/diesel/diesel.htm>

Using a linear regression of the data from the Table 18, the PM reduction from a change in aromatic content can be described as :

4-Stroke Engine

$$\text{PM reduction} = [(\text{Difference in Aromatic Volume}) * 0.785 + 0.05666]/100$$

For 2-Stroke engines, staff used test data from SWRI’s report published in 2000 entitled “Diesel Fuel Effects on Locomotive Exhaust Emissions” to estimate indirectly the potential PM reduction for 2-Stroke engines due to lower aromatics. Table 19 lists the summary of the test results.

Table 19. SWRI 2000 Study Summary Results

Locomotive Engine	Aromatic Changes (Volume %)	PM Difference (g/bhp-hr)	PM % Difference
4 Stroke	28.35 to 21.84	0.080	37.6%
2 Stroke	28.35 to 21.84	0.056	14.1%

Staff assumes that PM emission reduction from 2-Stroke engine will have a factor of 0.38 (14.1%/37.6%) to the 4-Stroke engine PM emission reduction.

Currently, the baseline locomotive emissions inventory assumes an aromatic total volume percent of 31%. Table 21 describes the changes in PM emission due to changes in total volume percent of aromatics.

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Table 20. Examples of PM Reductions Due to Changes in Aromatic Total Volume Percent

Aromatic Volume Percent		PM Reduction	PM Reduction	PM Reduction
From	To	2 Stroke	4 Stroke	Composite
31	28	0.9%	2.4%	1.3%
31	19	3.6%	9.5%	5.1%
31	10	6.3%	16.5%	8.9%

\*composite is 75% 2 Stroke Engine and 25% 4 Stroke Engine

Table 21, Table 22, and Table 23 show the PM emission reduction for the different type of fuels used in the state.

Table 21. PM Emission Percent Change of Line-Haul Due to Aromatics, Statewide

Calendar Year	CARB Aromatic Volume (%)	EPA Aromatic Volume (%)	Off-road Aromatic Volume (%)	Weighted Aromatic Volume (%)	PM Emission Percent Change
1992	31	31	31	31.00	0.00
1993	10	31	31	31.00	0.00
1994	10	31	31	31.00	0.00
1995	10	31	31	31.00	0.00
1996	10	31	31	31.00	0.00
1997	10	31	31	31.00	0.00
1998-2001	10	31	31	30.18	-0.004
2002-2006	10	31	31	29.05	-0.009
2007+	10	31	31	29.05	-0.009

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Table 22. Class I Line Haul Weighted Aromatic Volume Percent by Air Basin

Interstate Locomotive	Air Basin	1993-2001 Weighted Aromatic Volume Percent	2002+ Weighted Aromatic Volume Percent
Class I Line Haul	SCC	31.0	31.0
	MC	31.0	26.6
	MD	30.0	29.8
	NEP	31.0	27.9
	SC	31.0	31.0
	SF	28.6	23.1
	SJV	29.1	29.4
	SS	31.0	31.0
	SV	31.0	27.4

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Table 23. PM Emission Reduction from Intrastate Locomotives Due to Aromatics by Air Basin, 1993+

Intrastate Locomotive	Air Basin	CARB Aromatic Volume Percent	EPA Aromatic Volume Percent	Nonroad Aromatic Volume Percent	Weighted Aromatic Volume Percent	PM Emission Reduction Percent
Class I Local/Switcher	SC	10	31	31	29.0	-0.9%
	SJV	10	31	31	25.2	-2.4%
	MD	10	31	31	31.0	0.0%
	BA	10	31	31	13.9	-7.2%
	SD	10	31	31	13.2	-7.5%
	SV	10	31	31	13.2	-7.5%
	SCC	10	31	31	13.2	-7.5%
Class III Local/Switcher	SC	10	31	31	31.0	0.0%
	SJV	10	31	31	18.6	-5.2%
	MD	10	31	31	10.0	-8.8%
	BA	10	31	31	10.0	-8.8%
	SD	10	31	31	10.0	-8.8%
	SV	10	31	31	10.0	-8.8%
	SCC	10	31	31	10.0	-8.8%
	NEP	10	31	31	26.6	-1.9%
	MC	10	31	31	31.0	0.0%
	NC	10	31	31	10.0	-8.8%
	NCC	10	31	31	10.0	-8.8%
Industrial/Military	SC	10	31	31	24.0	-3.0%
	SJV	10	31	31	24.0	-3.0%
	MD	10	31	31	24.0	-3.0%
	BA	10	31	31	24.0	-3.0%
	NEP	10	31	31	24.0	-3.0%
	SD	10	31	31	24.0	-3.0%
	SV	10	31	31	24.0	-3.0%
	SCC	10	31	31	24.0	-3.0%
Passenger	SC	10	31	31	10.8	-8.5%
	SJV	10	31	31	10.0	-8.8%
	BA	10	31	31	10.0	-8.8%
	SD	10	31	31	10.0	-8.8%
	SV	10	31	31	10.0	-8.8%
	SCC	10	31	31	12.1	-8.0%

Source : Fuel Estimate from <http://www.arb.ca.gov/regact/carblohc/carblohc.htm>

**Sulfur**

Currently, the baseline locomotive emissions inventory assumes an average fuel sulfur content of 2700 ppm. Industry has provided information on the sulfur content of the fuel that is currently being used by intrastate locomotives. Together with industry data and prior locomotive tests, staff believes a fuel correction factor should be incorporated into the model.

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Table 24 shows the test data collected by the ARB, U.S. EPA, and others, where locomotive engines were tested on different fuel sulfur levels.

Table 24. Locomotive Engine Test with Different Sulfur Levels

Locomotive Engine	Fuel Properties Sulfur Content	Percent Change PM	Percent Change NOX	Percent Change CO	Percent Change HC	Source
EMD 12-645E3B	100/3300ppm	-0.29	-0.06	0.17	0.07	Fritz, 1991
GE DASH9-40C	330/3150ppm	-0.43	-0.07	-0.05	-0.18	Fritz (1995, EPA/SWRI)
MK 5000C	330/3150ppm	-0.71	-0.03	-0.03	-0.07	Fritz (1995, EPA/SWRI)
EMD 16-710G3B, SD70MAC	330/3150ppm	-0.38	-0.08	-0.30	-0.01	Fritz (1995, EPA/SWRI)
EMD SD70MAC	50/330ppm	-0.03	-0.04	0.07	0.01	Fritz (ARB/AAR, 2000)
EMD SD70MAC	50/4760ppm	-0.16	-0.06	0.08	0.03	Fritz (ARB/AAR, 2000)
EMD SD70MAC	330/4760ppm	-0.13	-0.03	0.01	0.01	Fritz (ARB/AAR, 2000)
GE DASH9-44CW	50/330ppm	-0.03	-0.03	-0.01	-0.04	Fritz (ARB/AAR, 2000)
GE DASH9-44CW	50/4760ppm	-0.39	-0.07	-0.02	0.02	Fritz (ARB/AAR, 2000)
GE DASH9-44CW	330/4760ppm	-0.38	-0.04	-0.02	0.06	Fritz (ARB/AAR, 2000)
GE DASH9-44CW	50/3190ppm	-0.27	-0.05	-0.03	0.01	Fritz (ARB/AAR, 2000)
GE DASH9-44CW	330/3190ppm	-0.25	-0.02	-0.02	0.04	Fritz (ARB/AAR, 2000)
GE DASH9-44CW	3190/4760ppm	-0.17	-0.02	0.00	0.02	Fritz (ARB/AAR, 2000)
Average		-0.28	-0.05	-0.01	0.00	

From the above table, staff concluded that HC and CO emissions are not affected by different sulfur levels in the fuel. From these tests, staff computed the changes in PM emissions associated with changes in sulfur level. Staff corrected the PM emissions to account for the aromatic differences because the test data were not tested at the same aromatic volume percent. Because the locomotive engine testing was performed at various fuel sulfur levels (some at 330 ppm vs. 3190 ppm and some at 50 ppm vs. 3190 ppm), staff cannot assume the average percent change in PM emission is characteristics over the whole range of sulfur levels. From previous studies that staff has analyzed, it is possible to generate estimates of the percent change at various sulfur levels and throttle positions. Locomotive engines have 8 throttle positions plus dynamic braking and idle. During idle, braking, and throttle positions 1 and 2, there are no significant differences in emissions attributable to sulfur level. For the GE 4-

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stroke engine, effect of sulfur on PM for throttle positions 3 to 8 can be defined by using the following equations:

Equations to correct for PM for GE (4-Stroke) engines

Notch 8 : PM (g/bhp-hr) = 0.00001308 \* (sulfur level,ppm) + 0.0967  
 Notch 7 : PM (g/bhp-hr) = 0.00001102 \* (sulfur level,ppm) + 0.0845  
 Notch 6 : PM (g/bhp-hr) = 0.00000654 \* (sulfur level,ppm) + 0.1037  
 Notch 5 : PM (g/bhp-hr) = 0.00000548 \* (sulfur level,ppm) + 0.1320  
 Notch 4 : PM (g/bhp-hr) = 0.00000663 \* (sulfur level,ppm) + 0.1513  
 Notch 3 : PM (g/bhp-hr) = 0.00000979 \* (sulfur level,ppm) + 0.1565

For the EMD 2-stroke engine, throttle positions 3 to 8 can be defined by using the following equations:

Equations to correct for PM for EMD (2-Stroke) engines

Notch 8 : PM (g/bhp-hr) = 0.0000123 \* (sulfur level,ppm) + 0.3563  
 Notch 7 : PM (g/bhp-hr) = 0.0000096 \* (sulfur level,ppm) + 0.2840  
 Notch 6 : PM (g/bhp-hr) = 0.0000134 \* (sulfur level,ppm) + 0.2843  
 Notch 5 : PM (g/bhp-hr) = 0.0000150 \* (sulfur level,ppm) + 0.2572  
 Notch 4 : PM (g/bhp-hr) = 0.0000125 \* (sulfur level,ppm) + 0.2629  
 Notch 3 : PM (g/bhp-hr) = 0.0000065 \* (sulfur level,ppm) + 0.2635

Table 25. Examples of PM Reductions Due to Changes in Sulfur Level

Sulfur Level (ppm)		PM Reduction	PM Reduction	PM Reduction
From	To	2 Stroke	4 Stroke	Composite
3100	1900	4.1%	8.4%	5.2%
3100	1300	6.1%	12.6%	7.7%
1300	330	3.5%	7.9%	4.6%
1300	140	4.2%	9.5%	5.5%
140	15	1.8%	4.0%	2.4%

\*composite is 75% 2 Stroke Engine and 25% 4 Stroke Engine

Data provided by industry show that when operating in California, the three main types of diesel fuel used in locomotive engines consists of CARB diesel, EPA On-Highway diesel fuel, and EPA Off-road or High Sulfur diesel fuel. Four-stroke engines and two-stroke engines show different characteristics with respect to sulfur content. From the BAH report, 4-stroke engines make up about 25%, and 2-stroke engines make up about 75% of the locomotive engine fleet. Combining industry data, 4-stroke/2-stroke engine percent change and fleet makeup, Table 26 shows the percent change in PM emissions by year for the line-haul segment of the fleet.

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Table 26. PM Emission Percent Change of Line-Haul Due to Sulfur, Statewide

Calendar Year	CARB Sulfur Content	EPA On-Highway Sulfur Content	EPA Off-road Sulfur Content	Weighted Fuel Sulfur Content	4-Stroke Engines PM Percent Change	2-Stroke Engines PM Percent Change	Weighted PM Emission Percent Change
1992	3100	3100	3100	3100	0.03	0.01	0.015
1993	500	330	3100	2919	0.02	0.01	0.009
1994	150	330	3100	2740	0.01	0.00	0.003
1995	140	330	3100	2557	-0.01	0.00	-0.006
1996	140	330	3100	2377	-0.02	-0.01	-0.014
1997	140	330	3100	2196	-0.04	-0.02	-0.022
1998-2001	140	330	3100	1899	-0.06	-0.03	-0.035
2002-2006	140	330	3100	1312	-0.10	-0.05	-0.061
2007+	15	15	330	129	-0.19	-0.09	-0.113

Table 27 and Table 28 provide further details of weighted fuel sulfur level by air basin. Weighted sulfur levels vary significantly from one air basin to another.

Table 27. Class I Line Haul Weighted Fuel Sulfur by Air Basin

Interstate Locomotive	Air Basin	1998 Weighted Sulfur	2002-2006 Weighted Sulfur	2007+ Weighted Sulfur
		ppm	ppm	ppm
Class I Line Haul	SCC	1023	467	31
	MC	2333	1149	113
	MD	2352	1767	180
	NEP	2560	1632	166
	SC	1985	1472	145
	SF	1711	899	88
	SJV	1600	868	78
	SS	2425	1328	129
	SV	2473	1456	147

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Table 28. Intrastate Locomotives Weighted Fuel Sulfur by Air Basin

Intrastate Locomotive	Air Basin	1993 Weighted Sulfur	1994-2006 Weighted Sulfur	2007+ Weighted Sulfur
		ppm	ppm	ppm
Class I Local/Switcher	SC	346	312	15
	SJV	377	278	15
	MD	330	330	15
	BA	468	175	15
	SD	475	169	15
	SV	475	169	15
	SCC	475	169	15
Class III Local/Switcher	SC	388	388	21
	SJV	1016	804	80
	MD	500	140	15
	BA	500	140	15
	SD	500	140	15
	SV	500	140	15
	SCC	500	140	15
	NEP	2628	2553	264
	MC	1573	1573	152
	NC	500	140	15
	NCC	500	140	15
Industrial/Military	SC	1340	1220	120
	SJV	1340	1220	120
	MD	1340	1220	120
	BA	1340	1220	120
	NEP	1340	1220	120
	SD	1340	1220	120
	SV	1340	1220	120
	SCC	1340	1220	120
Passenger	SC	493	147	15
	SJV	500	140	15
	BA	500	140	15
	SD	500	140	15
	SV	500	140	15
	SCC	483	159	15

Appendix B,C, and D contains the fuel correction factors for PM, NOx, and SOx emissions by air basin.

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**Revised Locomotive Emission Inventory**

Tables 29-31 shows the revised locomotive emission inventory for calendar years 2000,2010 and 2020.

Table 29. 2000 Statewide Locomotive Emission Inventory, tons/day

TYPE	HC	CO	NOx	PM	SOx
Intermodal/Line-Haul	5.61	18.21	113.03	2.68	6.22
Local/Short-Run	1.01	3.33	22.58	0.41	0.22
Mixed/Bulk	2.13	6.85	48.95	1.09	2.20
Passenger/Amtrak	0.53	1.01	12.21	0.29	0.05
Yard/Switcher	0.55	1.46	10.43	0.20	0.09
Total	9.83	30.86	207.20	4.67	8.78

Table 30. 2010 Statewide Locomotive Emission Inventory, tons/day

TYPE	HC	CO	NOx	PM	SOx
Intermodal/Line-Haul	5.56	21.90	71.35	2.40	0.60
Local/Short-Run	0.77	2.99	12.03	0.30	0.01
Mixed/Bulk	2.11	8.24	29.46	0.99	0.19
Passenger/Amtrak	0.58	1.14	12.29	0.31	0.02
Yard/Switcher	0.47	1.29	6.78	0.17	0.01
Total	9.49	35.56	131.91	4.17	0.83

Table 31. 2020 Statewide Locomotive Emission Inventory, tons/day

TYPE	HC	CO	NOx	PM	SOx
Intermodal/Line-Haul	5.60	25.84	74.33	2.38	0.71
Local/Short-Run	0.67	2.99	11.17	0.26	0.01
Mixed/Bulk	2.13	9.72	31.14	0.98	0.23
Passenger/Amtrak	0.56	1.14	11.72	0.30	0.02
Yard/Switcher	0.44	1.29	6.22	0.16	0.01
Total	9.40	40.98	134.58	4.08	0.98

## Appendix A

### Methodology to Calculate Locomotive Inventory

#### **Methodology**

The methodology and assumptions used for estimating locomotive emissions consists of several steps taken from the Booz-Allen Hamilton's Locomotive Emission Study report (<http://www.arb.ca.gov/app/library/libcc.php>). First, emission factor data from various engine manufacturers such as EMD and General Electric (GE) must be gathered to calculate average emission factors for locomotives operated by the railroad companies. Second, train operations data, including throttle position profiles and time spent on various types of operations from different railroad companies needs to be estimated. Finally, the locomotive emission inventory can be calculated using train operations data, emission factors, and throttle position profiles.

#### **Step 1 – Average Emission Factors**

Engine emission factors are required for the different locomotive engines manufactured by the major locomotive suppliers EMD or GE. Emission factors are obtained from testing done by either the engine manufacturers or by Southwest Research Institute, a consulting company that has performed many tests on locomotive engines. Table A-1 lists the available emission factors.

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Table A-1. Available Emission Factors for Different Locomotive Engines

Engine Manufacturer	Engine Model	Locomotive Model
EMD	12-567BC	SW10
EMD	12-645E	SW1500,MP15,GP15-1
EMD	16-567C	GP9
EMD	16-645E	GP38,GP38-2, GP28
EMD	12-645E3B	GP39-2
EMD	12-645E3	GP39-2, SD39
EMD	16-645E3	GP40, SD40, F40PH
EMD	16-645E3B	GP40-2, SD40-2, SDF40-2, F40PH
EMD	16-645F3	GP40X, GP50, SD45
EMD	16-645F3B	SD50
EMD	20-645E3	SD45,SD45-2, F45, FP45
EMD	16-710G3	GP60, SD60, SD60M
GE	127FDL2500	B23-7
GE	127FDL3000	SF30B
GE	167FDL3000	C30-7, SF30C
GE	167FDL4000	B40-8

Source: BAH report, 1992

Next, the locomotive roster from the largest railroad companies operating in the state were obtained. Table A-2 lists the locomotive roster for railroad companies in 1987.

Table A-2. Locomotive Roster 1987

Railroad Company	Engine Manufacturer	Engine Model	Horspower Rating	Units	Type of Service		
					Line Haul	Local	Yard/Switcher
ATSF	EMD	16-567BC	1500	211			X
ATSF	EMD	16-567C	1750	53			X
ATSF	EMD	16-567D2	2000	71		X	X
ATSF	EMD	16-645E	2000	69		X	X
ATSF	EMD	12-645E3	2300	62		X	
ATSF	EMD	12-645E3B	2300	60		X	
ATSF	EMD	16-645E3	2500	231	X	X	
ATSF	EMD	16-645E3	3000	18	X	X	
ATSF	EMD	16-645E3B	3000	203	X	X	
ATSF	EMD	16-645F3	3500	52	X		
ATSF	EMD	16-645F3B	3600	15	X		
ATSF	EMD	20-645E3	3600	243	X		
ATSF	EMD	16-710G3	3800	20	X		
ATSF	GE	GE-12	2350	60		X	
ATSF	GE	GE-12	3000	10	X	X	
ATSF	GE	GE-16	3000	226	X	X	

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ATSF	GE	GE-16	3600	43	X		
ATSF	GE	GE-16	3900	3	X		
ATSF	GE	GE-16	4000	20	X		
Union Pacific	EMD	16-645BC	1200	56			X
Union Pacific	EMD	12-567A	1200	12			X
Union Pacific	EMD	12-645E	1500	281			X
Union Pacific	EMD	16-567CE	1500	35			X
Union Pacific	EMD	16-645E	2000	365		X	X
Union Pacific	EMD	12-645E3C	2300	24		X	
Union Pacific	EMD	16-567D3A	2500	16		X	
Union Pacific	EMD	16-645E3	3000	828	X	X	
Union Pacific	EMD	16-645E3B	3000	446	X	X	
Union Pacific	EMD	16-645F3	3500	36	X		
Union Pacific	EMD	16-645F3B	3600	60	X		
Union Pacific	EMD	16-710G3	3800	227	X		
Union Pacific	GE	GE-12	2300	106		X	
Union Pacific	GE	GE-12	3000	57	X	X	
Union Pacific	GE	GE-16	3000	156	X	X	
Union Pacific	GE	GE-16	3750	60	X		
Union Pacific	GE	GE-16	3800	256	X		
Southern Pacific	EMD	12-567C	1200	11			X
Southern Pacific	EMD	12-645E	1500	286			X
Southern Pacific	EMD	16-567BC	1500	37			X
Southern Pacific	EMD	16-567C	1750	326		X	
Southern Pacific	EMD	16-567D2	2000	145		X	
Southern Pacific	EMD	16-645E	2000	84		X	
Southern Pacific	EMD	12-645E3	2300	12		X	
Southern Pacific	EMD	16-645E3	2500	137	X	X	
Southern Pacific	EMD	16-645E3	3000	92	X		
Southern Pacific	EMD	16-645E3B	3000	353	X		
Southern Pacific	EMD	16-645F3	3500	4	X		
Southern Pacific	EMD	20-645E3	3600	425	X		
Southern Pacific	EMD	16-710G3	3800	65	X		
Southern Pacific	GE	GE-12	2300	15		X	
Southern Pacific	GE	GE-12	3000	107	X		
Southern Pacific	GE	GE-16	3600	20	X		
Southern Pacific	GE	GE-16	3900	92	X		

Source : BAH report, 1992

Using the available emission factors and the locomotive rosters, the average emission factors for each class of service can be calculated. Emission factors for models that were not available were assigned an emission factor based on horsepower rating and the number of cylinders from similar engine models.

**Step 2 – Throttle Position Profiles and Train Operations Data**

The railroad companies provided throttle position profiles. Locomotive engines operate at eight different constant loads and speeds called throttle notches. In

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addition, several other settings (idle and dynamic brake) are also common. For line haul and local operations, profiles were obtained from Train Performance Calculation (TPC) data and actual event recorder data, which are summarized in the BAH report.

For line haul operations, the data was modified to account for additional idle time between dispatch. Data supplied by Atchison, Topeka and Santa Fe (ATSF) indicates that the turnaround time for line haul locomotives in yards is approximately eight hours.

For local operations, several assumptions were used to develop throttle profiles. First, ten hours was used as an average hours per assignment. Second, the additional average idle time per day per locomotive was assumed to be ten hours.

The switch engine duty cycle is based upon actual tape data supplied by the ATSF railroad company on a switch engine that operated over a 2-day period. Yard engines are assumed to operate 350 days per year, with 2 weeks off for inspections and maintenance.

Train operations data provided by the railroad companies included :

<b>Line Haul</b>	<b>Local</b>	<b>Yard/Switcher</b>
Train type	Average trailing tons	Number of units assigned
Number of runs per year	Number of runs per year	Number of assignments
Average horsepower	Average horsepower	Average horsepower
Average units	Average units	
Origin/destination	Origin/destination	
Link miles		

**Step 3 – Calculate Locomotive Emission Inventory**

Emission inventories are calculated on a train-by-train basis using train operations data, average emission factor, and throttle position profiles.

Emission Inventory = Emission factor x average horsepower x time in notch per train x number of runs per year

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Appendix B  
PM Fuel Correction Factor by Air Basin

Interstate Loc	Air Basin	PM Fuel Correction Factor															
		pre 1993	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007+
Class I Line	SCC	1.000	0.991	0.982	0.973	0.964	0.955	0.937	0.931	0.925	0.919	0.913	0.913	0.913	0.913	0.913	0.883
	MC	1.000	0.998	0.996	0.994	0.992	0.990	0.987	0.971	0.955	0.939	0.923	0.923	0.923	0.923	0.923	0.867
	MD	1.000	0.998	0.995	0.993	0.991	0.988	0.984	0.978	0.973	0.967	0.962	0.962	0.962	0.962	0.962	0.884
	NEP	1.000	0.999	0.998	0.998	0.997	0.996	0.995	0.983	0.971	0.959	0.947	0.947	0.947	0.947	0.947	0.875
	SC	1.000	0.996	0.993	0.989	0.986	0.982	0.975	0.970	0.965	0.960	0.955	0.955	0.955	0.955	0.955	0.888
	SF	1.000	0.993	0.987	0.980	0.974	0.967	0.954	0.940	0.926	0.912	0.898	0.898	0.898	0.898	0.898	0.851
	SJV	1.000	0.993	0.986	0.979	0.972	0.965	0.952	0.944	0.937	0.930	0.923	0.923	0.923	0.923	0.923	0.878
	SS	1.000	0.999	0.997	0.996	0.995	0.993	0.991	0.980	0.970	0.959	0.949	0.949	0.949	0.949	0.949	0.887
	SV	1.000	0.993	0.986	0.979	0.972	0.965	0.952	0.948	0.945	0.942	0.939	0.939	0.939	0.939	0.939	0.873

Intrastate Loc	Air Basin	PM Fuel Correction Factor															
		pre 1993	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007+
Class I Local	SC	1.000	0.890	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.865
	SJV	1.000	0.863	0.858	0.858	0.858	0.858	0.858	0.858	0.858	0.858	0.858	0.858	0.858	0.858	0.858	0.836
	MD	1.000	0.906	0.906	0.906	0.906	0.906	0.906	0.906	0.906	0.906	0.906	0.906	0.906	0.906	0.906	0.882
	BA	1.000	0.778	0.764	0.764	0.764	0.764	0.764	0.764	0.764	0.764	0.764	0.764	0.764	0.764	0.764	0.747
	SD	1.000	0.772	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.741
	SV	1.000	0.772	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.741
	SCC	1.000	0.772	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.758	0.741
Class III Local	SC	1.000	0.909	0.909	0.909	0.909	0.909	0.909	0.909	0.909	0.909	0.909	0.909	0.909	0.909	0.909	0.882
	SJV	1.000	0.839	0.830	0.830	0.830	0.830	0.830	0.830	0.830	0.830	0.830	0.830	0.830	0.830	0.830	0.787
	MD	1.000	0.749	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.717
	BA	1.000	0.749	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.717
	SD	1.000	0.749	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.717
	SV	1.000	0.749	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.717
	SCC	1.000	0.749	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.717
	NEP	1.000	0.963	0.960	0.960	0.960	0.960	0.960	0.960	0.960	0.960	0.960	0.960	0.960	0.960	0.960	0.858
	MC	1.000	0.959	0.959	0.959	0.959	0.959	0.959	0.959	0.959	0.959	0.959	0.959	0.959	0.959	0.959	0.888
	NC	1.000	0.749	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.717
NCC	1.000	0.749	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.722	
Industrial/Milit	SC	1.000	0.894	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.831
	SJV	1.000	0.894	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.831
	MD	1.000	0.894	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.831
	BA	1.000	0.894	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.831
	NEP	1.000	0.894	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.831
	SD	1.000	0.894	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.831
	SV	1.000	0.894	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.831
	SCC	1.000	0.894	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.889	0.831
Passenger	SC	1.000	0.754	0.739	0.739	0.739	0.739	0.739	0.739	0.739	0.739	0.739	0.739	0.739	0.739	0.739	0.723
	SJV	1.000	0.749	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.717
	BA	1.000	0.749	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.717
	SD	1.000	0.749	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.717
	SV	1.000	0.749	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.733	0.717
	SCC	1.000	0.764	0.749	0.749	0.749	0.749	0.749	0.749	0.749	0.749	0.749	0.749	0.749	0.749	0.749	0.733



**PRELIMINARY DRAFT – DO NOT CITE OR QUOTE**

Appendix D  
SOx Fuel Correction Factor by Air Basin

Interstate Loc	Air Basin	SOx Fuel Correction Factor															
		pre 1993	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007+
Class I Line H	SCC	1.000	0.896	0.793	0.689	0.586	0.482	0.379	0.327	0.276	0.225	0.173	0.173	0.173	0.173	0.173	0.011
	MC	1.000	0.977	0.955	0.932	0.909	0.887	0.864	0.755	0.645	0.535	0.426	0.426	0.426	0.426	0.426	0.042
	MD	1.000	0.979	0.957	0.936	0.914	0.893	0.871	0.817	0.763	0.709	0.654	0.654	0.654	0.654	0.654	0.067
	NEP	1.000	0.991	0.983	0.974	0.965	0.957	0.948	0.862	0.776	0.690	0.605	0.605	0.605	0.605	0.605	0.062
	SC	1.000	0.956	0.912	0.868	0.823	0.779	0.735	0.688	0.640	0.593	0.545	0.545	0.545	0.545	0.545	0.054
	SF	1.000	0.939	0.878	0.817	0.756	0.695	0.634	0.559	0.483	0.408	0.333	0.333	0.333	0.333	0.333	0.033
	SJV	1.000	0.932	0.864	0.796	0.728	0.660	0.593	0.525	0.457	0.389	0.322	0.322	0.322	0.322	0.322	0.029
	SS	1.000	0.983	0.966	0.949	0.932	0.915	0.898	0.797	0.695	0.594	0.492	0.492	0.492	0.492	0.492	0.048
SV	1.000	0.986	0.972	0.958	0.944	0.930	0.916	0.822	0.728	0.634	0.539	0.539	0.539	0.539	0.539	0.054	

Intrastate Loc	Air Basin	SOx Fuel Correction Factor															
		pre 1993	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007+
Class I Local	SC	1.000	0.128	0.127	0.126	0.125	0.124	0.122	0.121	0.120	0.119	0.118	0.117	0.115	0.115	0.115	0.006
	SJV	1.000	0.139	0.136	0.133	0.130	0.126	0.123	0.120	0.116	0.113	0.110	0.106	0.103	0.103	0.103	0.006
	MD	1.000	0.122	0.122	0.122	0.122	0.122	0.122	0.122	0.122	0.122	0.122	0.122	0.122	0.122	0.122	0.006
	BA	1.000	0.173	0.164	0.154	0.144	0.134	0.124	0.114	0.104	0.095	0.085	0.075	0.065	0.065	0.065	0.006
	SD	1.000	0.176	0.165	0.155	0.145	0.135	0.124	0.114	0.104	0.093	0.083	0.073	0.062	0.062	0.062	0.006
	SV	1.000	0.176	0.165	0.155	0.145	0.135	0.124	0.114	0.104	0.093	0.083	0.073	0.062	0.062	0.062	0.006
SCC	1.000	0.176	0.165	0.155	0.145	0.135	0.124	0.114	0.104	0.093	0.083	0.073	0.062	0.062	0.062	0.006	
Class III Local	SC	1.000	0.144	0.144	0.144	0.144	0.144	0.144	0.144	0.144	0.144	0.144	0.144	0.144	0.144	0.144	0.008
	SJV	1.000	0.376	0.369	0.362	0.355	0.348	0.341	0.333	0.326	0.319	0.312	0.305	0.298	0.298	0.298	0.029
	MD	1.000	0.185	0.173	0.161	0.149	0.137	0.125	0.112	0.100	0.088	0.076	0.064	0.052	0.052	0.052	0.006
	BA	1.000	0.185	0.173	0.161	0.149	0.137	0.125	0.112	0.100	0.088	0.076	0.064	0.052	0.052	0.052	0.006
	SD	1.000	0.185	0.173	0.161	0.149	0.137	0.125	0.112	0.100	0.088	0.076	0.064	0.052	0.052	0.052	0.006
	SV	1.000	0.185	0.173	0.161	0.149	0.137	0.125	0.112	0.100	0.088	0.076	0.064	0.052	0.052	0.052	0.006
	SCC	1.000	0.185	0.173	0.161	0.149	0.137	0.125	0.112	0.100	0.088	0.076	0.064	0.052	0.052	0.052	0.006
	NEP	1.000	0.973	0.971	0.968	0.966	0.963	0.961	0.958	0.956	0.953	0.951	0.948	0.946	0.946	0.946	0.098
	MC	1.000	0.583	0.583	0.583	0.583	0.583	0.583	0.583	0.583	0.583	0.583	0.583	0.583	0.583	0.583	0.056
	NC	1.000	0.185	0.173	0.161	0.149	0.137	0.125	0.112	0.100	0.088	0.076	0.064	0.052	0.052	0.052	0.006
NCC	1.000	0.185	0.173	0.161	0.149	0.137	0.125	0.112	0.100	0.088	0.076	0.064	0.052	0.052	0.052	0.006	
Industrial/Milit	SC	1.000	0.496	0.492	0.488	0.484	0.480	0.476	0.472	0.468	0.464	0.460	0.456	0.452	0.452	0.452	0.044
	SJV	1.000	0.496	0.492	0.488	0.484	0.480	0.476	0.472	0.468	0.464	0.460	0.456	0.452	0.452	0.452	0.044
	MD	1.000	0.496	0.492	0.488	0.484	0.480	0.476	0.472	0.468	0.464	0.460	0.456	0.452	0.452	0.452	0.044
	BA	1.000	0.496	0.492	0.488	0.484	0.480	0.476	0.472	0.468	0.464	0.460	0.456	0.452	0.452	0.452	0.044
	NEP	1.000	0.496	0.492	0.488	0.484	0.480	0.476	0.472	0.468	0.464	0.460	0.456	0.452	0.452	0.452	0.044
	SD	1.000	0.496	0.492	0.488	0.484	0.480	0.476	0.472	0.468	0.464	0.460	0.456	0.452	0.452	0.452	0.044
	SV	1.000	0.496	0.492	0.488	0.484	0.480	0.476	0.472	0.468	0.464	0.460	0.456	0.452	0.452	0.452	0.044
	SCC	1.000	0.496	0.492	0.488	0.484	0.480	0.476	0.472	0.468	0.464	0.460	0.456	0.452	0.452	0.452	0.044
Passenger	SC	1.000	0.183	0.171	0.159	0.148	0.136	0.124	0.113	0.101	0.090	0.078	0.066	0.055	0.055	0.055	0.006
	SJV	1.000	0.185	0.173	0.161	0.149	0.137	0.125	0.112	0.100	0.088	0.076	0.064	0.052	0.052	0.052	0.006
	BA	1.000	0.185	0.173	0.161	0.149	0.137	0.125	0.112	0.100	0.088	0.076	0.064	0.052	0.052	0.052	0.006
	SD	1.000	0.185	0.173	0.161	0.149	0.137	0.125	0.112	0.100	0.088	0.076	0.064	0.052	0.052	0.052	0.006
	SV	1.000	0.185	0.173	0.161	0.149	0.137	0.125	0.112	0.100	0.088	0.076	0.064	0.052	0.052	0.052	0.006
	SCC	1.000	0.179	0.168	0.157	0.146	0.135	0.124	0.113	0.103	0.092	0.081	0.070	0.059	0.059	0.059	0.006