



Air Resources Board



Linda S. Adams
Secretary for
Environmental Protection

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov

Arnold Schwarzenegger
Governor

September 3, 2008

Ms. Karen Dzienkowski, Director
Motive Power Inc.
Short Line Sales and Emissions Initiatives
4600 Apple Street
Boise, Idaho 83716

Home Address
Ms. Karen Dzienkowski
4 Chaucer Court
Mill Valley, California 94941

Dear Ms. Dzienkowski:

This letter is in reply to your request dated August 22, 2008 for a provisional verification of the oxides of nitrogen (NOx) and particulate matter (PM) emission levels for Motive Power (MP) multiple nonroad engine locomotives - MP21 (a three-engine "genset") and MP14 (a two-engine "genset"). This verification would be for MP locomotives that are built with multiple nonroad generator (genset) Tier 3 nonroad engines as the primary diesel engine power. The primary purpose of the "provisional" Air Resources Board (ARB) verification would be to allow rail operators to apply for and potentially be selected for Carl Moyer Program funds for the MP21 and MP14 locomotives. This provisional ARB verification would not extend to the actual payment of Carl Moyer Program funds to purchase the MP21 and MP14 locomotives.

Alternative technology switcher locomotives funded by the Carl Moyer Program, such as genset locomotives, typically include an existing locomotive frame significantly refurbished with a new engine or engines, electronics, controls, and other equipment. For Carl Moyer Program funding, an alternative technology switcher must achieve a NOx emission rate of 3.5 g/bhp-hr and a PM emission rate of 0.14 g/bhp-hr, based on U.S. EPA locomotive emission testing requirements specified in Title 40 Code of Federal Regulations (CFR) Part 92.

We recognize that the MP21 multiple (three) engine switch locomotive 40 CFR Part 92 locomotive federal test procedures emission testing results meet the alternative technology switcher NOx and PM emissions criteria. In addition, they meet or exceed federal locomotive line haul and switch duty cycle Tier 2 emissions standards for these pollutants as well as for hydrocarbons. However, the carbon monoxide (CO) emission levels were above current federal Tier 2 emission standards. Your August 22, 2008

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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correspondence indicated that the likely reason the CO levels were above the federal Tier 2 emission standards was a bad fuel injector, identified after emission testing and during subsequent field testing. This faulty fuel injector may have potentially adversely affected other pollutant levels. You have agreed to have the MP21 locomotive retested pursuant to 40 CFR Part 92 again when the unit completes field testing in Canada.

We agree that there is a strong possibility that an engine (fuel injector) malfunction could have potentially caused the higher CO emission levels. This preliminary finding is based on other Cummins QSK19 multiple engine switch locomotive emission testing results (pursuant to 40 CFR Part 92). We also agree, based on prior switch locomotive emission testing results, that the MP21 with three Cummins QSK19 Tier 3 nonroad engines should have emissions similar to the MP14 two-engine emission levels.

To ensure adequate protection of California air quality, we will grant a "provisional" ARB verification for Carl Moyer Program funding applications for both the MP21 and MP14 switch locomotive models. This provisional verification can only be used for the application and selection of projects for Carl Moyer Program funding. However, this provisional verification is conditional: MP must provide ARB with subsequent 40 CFR Part 92 locomotive emission testing results for both the MP21 and MP14 that meet all applicable Carl Moyer Program alternative technology switcher locomotive emissions criteria and standards. This condition must be met prior to the payment of Carl Moyer Program funds for either the MP21 or MP14 switch locomotives.

If you have any questions please contact Mr. Dean C. Simeroth, Chief, Criteria Pollutants Branch, at (916) 322-6020, or at dsimerot@arb.ca.gov.

Sincerely,

/s/ by RDF

Robert D. Fletcher, Chief
Stationary Source Division

cc: Mr. Glenn Passavant, Director
Nonroad Center
U.S. Environmental Protection Agency
2000 Plymouth Road
Ann Arbor, Michigan 48105

Mr. Dean C. Simeroth, Chief
Criteria Pollutants Branch