

PRELIMINARY DRAFT

(as opposed to noise)

EXECUTIVE SUMMARY

In this draft report, the Air Resources Board (ARB/Board) staff provides a technical evaluation for public comment of 37 options that may accelerate further statewide locomotive and localized locomotive and non-locomotive railyard emission reductions. This technical evaluation of each option addresses the technical feasibility, potential emission reductions, costs, and relative cost-effectiveness. The purpose of this document is to provide a sound technical basis for the ongoing dialogue on how best to achieve further emissions reductions of oxides of nitrogen (NOx) and diesel particulate matter (PM or diesel PM).

exhaust

add unknowns remaining challenges.

This draft report is intended to provide an initial technical assessment of various options that are available or may be available in the near future to accelerate and provide additional emissions reductions from locomotives and major railyards in California. It is not intended to serve as an implementation blueprint, as it does not evaluate which agency or agencies may have authority to implement such options. The document also does not evaluate what role, if any, the availability of public funding might play in assuring earlier or further reductions.

Following receipt and evaluation of the public comments, ARB staff will develop a final report on the technical evaluation of the options. Following the completion of that report, ARB staff will develop a second draft report for public comment that addresses possible implementation mechanisms. The range of mechanisms includes direct regulation, incentive funds, voluntary actions by the railroads, and enforceable agreements with the railroads.¹ This second report will draw on the results of the previous technical evaluation. In developing the second report, ARB staff will again seek public comments.

This Executive Summary presents the options evaluated and the preliminary results of the technical evaluation. The options identified may not represent all of the possible options available and staff is seeking comments on other potential options. In addition, the Executive Summary highlights several priority options for consideration. Additional details and background information is presented in the main report and in the Appendices.

A. BACKGROUND

Since the early 1990's, the Air Resources Board (ARB) has worked to develop innovative ways to provide significant emission reductions beyond federal locomotive emissions standards. The ARB has employed a combination of implementation mechanisms such as state regulations, voluntary agreements, and incentive programs to further reduce locomotive and railyard emissions beyond federal requirements. These innovative efforts achieved reductions in spite of specific federal preemptions to

not with standing

¹ The Board adopted Resolution 05-40 on July 21, 2005, concerning any future enforceable agreements. For a copy of the resolution, see <http://www.arb.ca.gov/railyard/ryagreement/b-rslution.pdf> . For related Board meeting transcript, see <http://www.arb.ca.gov/board/mt/mt072105.txt> .

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Amendments of 1990

regulate locomotive emissions in the federal Clean Air Act and other statutory programs.

The ARB continues to work with affected stakeholders to identify innovative approaches that will build on past efforts to reduce railyard and statewide locomotive emissions! ARB staff is seeking collaborative approaches. To that end, the ARB staff hopes the technical evaluation of options can be used as a basis for discussions with railroads and other stakeholders to accelerate further reductions from locomotives and railyards, or as a blueprint for use of public incentive funding, or for both purposes.

within the existing regulatory framework

B. Summary of Technical Options Evaluated

The technical evaluation considered 37 options for reducing emissions from locomotives and from non-locomotive sources at railyards. In most cases, there was sufficient information to determine technical feasibility, potential emission reductions, costs, and relative cost-effectiveness. In other options, staff notes where such data do not exist.

Staff evaluated technical feasibility based on the state of development of a particular technology or operational measure. Technical feasibility was also evaluated based on the ability to implement a given technology or option within existing or future locomotive or railyard operations. In a number of cases, staff assessed when a technology was developed or could become be developed and when the technology could become U.S. EPA certified or ARB verified.

Staff generally calculated potential emissions reductions on a per unit basis. With available data, potential emissions reductions were calculated for regional and statewide benefits. Please note that some options are dependent on the implementation of other options and potential emissions reductions may not be additive when determining emission benefits. Costs were primarily based on capital costs, but in some cases included operational, maintenance, and replacement costs when applicable or where the information was available.

estimates locomotive?

Cost-effectiveness was typically calculated by dividing total costs by the amount of NOx and PM pollutants reduced, over a specified range of years of use or useful life. The pollutants reduced were generally both diesel PM and NOx, but there are a few exceptions when information was not available. Staff tried to develop a simple cost-effectiveness range based on pollutants reduced in 2005 versus, in many cases, 2015 or 2020 to show the relative benefits of the various options.

This simple methodology for cost-effectiveness will ensure the highest degree of consistency when comparing different types of technologies or measures. This approach is also flexible enough for reviewers to recalculate the cost-effectiveness based on another methodology (e.g., the Carl Moyer Program). However, as this is a technical evaluation document, and not an implementation document, staff tried to avoid adopting a particular program cost-effectiveness methodology.

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Tables ES-1 through ES-4 provide an assessment of the 37 options evaluated to further reduce and accelerate locomotive and non-locomotive emissions reductions. The

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assessments are based on the following criteria: technical feasibility, potential emissions reductions, capital and other costs, and cost-effectiveness. The options are also assessed based on a potential schedule for implementation in California: near-term (within 5 years), mid-term (within 10 years), and long-term (generally within 15 years). Note that the option numbers correspond to the option numbers listed in the main body of the report.

**Table ES-1
Options to Accelerate Further
Locomotive Emissions Reductions**

Option #	Near-Term Options (up to 5 years)	Emission Reductions Statewide (tons per day)		Cost-Effectiveness (NOx+PM) **	Costs (Millions)
		PM	NOx		
Locomotive Replacements or Engine Repowers					
1	Replace 152 older switch locomotives with new ULESL switch locomotives (\$1.5 million/unit)	0.30	6.6	\$2-5/lb (10-20 years)	\$230
5	Repower 400 older MHP locomotives with new LEL engines (\$1 million/unit); <i>or, See Option #6 below</i>	1.25	23.0	\$1-2/lb (10-20 years)	\$400
	SUBTOTAL	1.55	29.6	\$1-5/lb	\$630
6	A possible alternative to Option #2, replace up to 200 of the 400 older MHP locomotives with new MHP gen-set locomotives (\$2 million/unit)	0.63	13.3	\$2-4/lb (10-20 years)	\$400
<i>Locomotive Remanufacturing Options – Less Expensive Alternatives to Options #1 and #5</i>					
4	Remanufacture 152 older switch locomotives to meet U.S. EPA Tier 0 Plus emission standards * (\$250,000/unit)	0.22 *	2.2 *	\$1-2/lb (10-20 years)	\$38
8	Remanufacture 400 older MHP locomotives to meet U.S. EPA Tier 0 Plus emission standards * (\$250,000/unit)	1.0 *	13.0 *	\$0.50-1/lb (10-20 years)	\$100
	<i>SUBTOTAL</i>	<i>1.22 *</i>	<i>15.2 *</i>	<i>\$0.5-2.50/lb</i>	<i>\$138</i>
* Note: Estimated emissions reductions are highly dependent on whether the railroads choose to remanufacture older locomotives.					
** Cost-effectiveness ranges are based on 10 to 20 years of useful life and may not add up precisely due to rounding.					
	Mid-Term Options (up to 10 years)				
Locomotive Aftertreatment (DPF and SCR) – Enhanced Benefits from Options #1 and #2					
2	Retrofit 244 ULESL switch locomotives with DPF and SCR (\$200,000/retrofit)	0.04	1.0	\$3-7/lb (10-20 years)	\$50
7	Retrofit 400 LEL or gen-set MHP locomotives with DPF and SCR (\$500,000/retrofit)	0.18	6.8	\$2-4/lb (10-20 years)	\$200
	SUBTOTAL	0.22	7.8	\$2-7/lb	\$250
	TOTALS (Options 1,5,2,7)	1.77	37.4	\$1-7/lb	\$880

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Table ES-3
Options to Accelerate Further
Advanced System Emissions Reductions

Option #	Near-Term Options (up to 5 years)	Emission Reductions Statewide (tons per day)		Cost-Effectiveness (NOx+PM)	Costs (millions)
		PM	NOx		
21	ALECS or Hood Technology (All 18 railyards service/ maintenance/ fueling diesel PM emissions – 18 tpy. UP Roseville about 1 tpy in one location of railyard).	0.0027	0.0548	\$30/lb (20 years)	\$25/unit
22	Locomotive Remote Sensing	*	*	*	\$0.25 **
23	Idle Reduction Devices on All Interstate Line Haul Locomotives	*	*	*	\$5k-40k/unit
25	GE Electric Hybrid Locomotive	*	*	*	*
27	CARB Diesel Required on All Interstate Line Haul Locomotives Prior to Entering California ¹	0.2	1.0	\$15/lb	\$0.036/day
28	California Locomotive In-Use Emission Testing	*	*	*	\$1 ***
<p>* Staff believes these options will not provide emissions reductions beyond current programs. ** Costs are for one remote sensing device, total costs would depend on number of remote sensing devices procured. *** Costs are annual costs to test 15 locomotives with SWRI mobile lab – which would be equivalent to the federal in-use locomotive emissions testing program. Does not include the costs for California to develop its own locomotive emissions testing facility.</p>					
Option #	Mid to Long-Term Options (up to 10 or 15 years or more)	PM (tons per day)	NOx (tons per day)	Cost-Effectiveness (NOx+PM)	Costs (millions)
24	BNSF Hydrogen Fuel Cell Locomotive	***	***	***	\$3.5/ demonstrator
26	Ethanol-Fueled Locomotive	***	***	***	\$1.5/unit
30	Maglev from Ports of LA/LB to UP ICTF and proposed BNSF SCIG	0.033	0.66 **	\$40-105/lb (15 years)	\$300- \$800
31	Linear Induction Motors (LIMs) Retrofit of Major Freight Rail Lines in the South Coast Air Basin	0.7 *	14.2 *	\$30/lb (30 years)	\$10,000
39	Electrification of Major Freight Rail Lines in the South Coast Air Basin	0.7 *	14.2 *	\$40/lb (30 years)	\$13,000
<p>* Assumes 80 and 70 percent of PM and NOx locomotive emissions are reduced in the South Coast Air Basin. ** Estimated based on a factor of 20 of NOx to PM. *** Insufficient data. ¹ Most of these potential CARB diesel emission reductions would occur between state boundaries and major UP and BNSF refueling depots (e.g., Needles to Barstow, Truckee to Roseville, Yuma, AZ to Colton, CA, Las Vegas, NV to Yermo).</p>					

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**Table ES-4
Options to Accelerate Further
Individual Railyard Emissions and Risk Reductions**

Option #	Near-Term Options	Emission Reductions Statewide (tons per day)		Cost-Effectiveness (NOx+PM)	Costs (millions)
		PM	NOx		
32	Build walls around the perimeter of railyards (Serve as barrier to diesel PM emissions)	*	*	*	\$2.4/mile
33	Plant trees around the perimeter of railyards (To filter and create barrier to diesel PM emissions)	*	*	*	\$.25/mile
34	Install indoor air filtration systems in nearby schools and residents	*	*	*	\$1-5k/central unit
35	Install air monitoring stations near the railyard	*	*	*	\$30k/unit \$30k annual
36	Enhance state and local locomotive and truck enforcement efforts.	*	*	*	Railyard specific and costs unknown
37	Relocate emissions sources further away from residential receptors	*	*	*	Railyard specific. Costs unknown.
* Staff has no data to estimate potential diesel PM emissions reductions. Also, when emissions reductions may be possible, they would likely be railyard specific – based on specific railyard operations, location of residents to railyards, etc. Without emissions reductions data, staff was not able to calculate cost-effectiveness.					

C. Staff Preliminary Recommendations High Priority Options

After reviewing the results of the technical evaluation, staff has identified several high priority options. These options have the potential to achieve significant emissions reductions in the near term either on a railyard-specific basis or a regional basis, or both. Implementation of these options would not preclude other options being pursued. The high priority options are identified in Table ES-5. Table ES-6 represents similar options for the South Coast Air Basin.

Achieving these results will require future collaboration between all stakeholders to develop an implementation mechanism that assures the reductions are achieved in a timely manner. As discussed in the main report, the technology for Option 1 is available; other options may require the development and demonstration of technology. These demonstrations are in progress and staff believes that the technology transfer has a high probability for success. Even so, it is important to recognize that not all of the options can be implemented immediately.

OK - I get it.
 What happened to
 the 192 from Table
 ES-1?

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Table ES-5
 High Priority Near-Term (By 2014)
 Options for the Rest of the State
 (Other Than the South Coast Air Basin)

Why not include
 cost-effectiveness
 estimates here?

Near-Term Options	Technology Demonstrated	Emission Reductions Statewide (tons per day)		Costs (Millions)
		PM	NOx	
Replace 89 older switch locomotives with new ULESL switch locomotives (\$1.5 million/unit)	Yes	0.16	3.8	\$134
Repower 250 older MHP locomotives with LEL engines (\$1 million/unit) or new MHP gen-set locomotives (\$2 million/unit)	In Process	0.78	14.4	\$250 to \$500
SUBTOTAL		0.94	18.2	\$384-\$634
Retrofit DPF and SCR onto 105 ULESL switch locomotives (\$200,000/retrofit)	In Process	0.02	0.40	\$21
Retrofit DPF and SCR onto 250 MHP LEL engines or new gen-set locomotives (\$500,000/retrofit)	In Process	0.11	4.25	\$125
SUBTOTAL		0.13	4.7	\$146
TOTALS		1.07	22.9	\$530-\$780

* May not add up precisely due to rounding.

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Table ES-6
 High Priority Options for
 Reducing Emissions in the Near Term (By 2014)
 in the South Coast Air Basin

Add cost effectiveness

Option	Technology Demonstrated	Emission Reductions by 2014 South Coast Air Basin (tons per day)		Costs (Millions)
		PM	NOx	
Replace 63 older switch locomotives with new ULESL switch locomotives (\$1.5 million/unit)	Yes	0.14	2.8	\$95 *
Repower 150 older MHP locomotives with LEL engines (\$1 million/unit) or new gen-set MHP locomotives (\$2 million/unit)	In Process	0.47	8.6	\$150-\$300
SUBTOTAL		0.61	11.4	\$245-\$395
Retrofit DPF and SCR onto 139 ULESL switch locomotives (\$200,000/retrofit)	In Process	0.02	0.60	\$28 *
Retrofit DPF and SCR onto 150 MHP LEL engines or new gen-set locomotives (\$500,000/retrofit)	In Process	0.07	2.55	\$75
SUBTOTAL		0.09	3.2	\$103
TOTALS		0.7	14.6	\$348-\$498

* May not add up precisely due to rounding.

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The proposed locomotive options would provide the largest emissions and risk reductions within railyards, regionally, and statewide. Non-Locomotive railyard electrification, if proven operationally feasible and cost-effective, could potentially nearly eliminate railyard cargo handling equipment emissions. Similarly, were the ALECS or Hood Technology prove to be operationally feasible and cost-effective, it could potentially reduce some stationary locomotive emissions at large locomotive classification and mechanical and servicing railyards. The locomotive options combined could potentially reduce railyard diesel PM risks by up to another 50 percent (e.g., from 100 to 50 in a million).

The eight intermodal railyard drayage trucks emissions are estimated to ^{total?} be about about 3 tons per year in 2015, largely due to the ARB drayage truck regulation. Staff believes advanced systems approaches will become more feasible and cost effective in the future, and may become the ultimate solution to further reduce railyard diesel truck emissions. In the medium-term, employing Maglev or other non-fossil technology (i.e., petroleum based) to move containers from the Ports of Los Angeles and Long Beach to near-dock intermodal railyards could be the least emitting, and could completely replace drayage trucks operating on highways and local arterials.

like what? What is an "advanced systems approach"?

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I. INTRODUCTION

This introduction presents background information on locomotives and railyards, including emissions and efforts taken to reduce emissions. This information forms the basis for the technology evaluation. The technical evaluations of the locomotive and non-locomotive railyard options are based on the following criteria: background, technical and operational feasibility, potential emissions reductions, capital and other costs, and cost-effectiveness.

Chapter 1 is an introduction and background. In Chapter 2, we examine options to reduce locomotive emissions. In Chapter 3, we examine options to reduce non-locomotive railyard emissions (e.g., cargo handling equipment, heavy duty trucks, transport refrigeration units, and offroad equipment). In Chapter 4, we examine options to reduce locomotive and railyard emissions with advanced systems such as the hood technology, remote sensing devices, rail electrification, and magnetic levitation (Maglev). In Chapter 5, we examine options to reduce railyard specific emissions and health risks through operational and physical changes within the railyards such as moving railyard emission sources further away from the closest residents, installing walls and trees, enhanced local enforcement efforts, and installing air monitoring stations near railyards. *proposed*

All of this information is used to identify and assess each of the options based on technical feasibility, potential emissions reductions, costs, and cost-effectiveness.

A. Emissions from Locomotives and Railyards

In this section we examine locomotive and railyard emissions to determine which emissions sources generate the most emissions and present the greatest risks to public health today and in the future.

1. Emissions from Locomotives

In 2005, California's locomotive NOx and PM emissions were about 160 and 4.8 tons per day, respectively. The ARB emission inventory estimates that interstate line haul locomotives contribute to about 90 percent of statewide locomotive NOx and PM emissions. Interstate line haul locomotives typically move across the country (e.g., Los Angeles to Chicago). Switch and passenger locomotives typically operate primarily within the State and are estimated to contribute about 5 percent each towards statewide locomotive NOx and PM emissions. See Table I-1 for more information on statewide locomotive emissions.

2. Emissions at 18 Railyards

Under the 2005 ARB and railroad agreement, the ARB and railroads recently prepared health risk assessments for 18 major railyards in the State. The health risk assessments included detailed railyard and off-site (within a 1 to 2 mile radius of each

① Add Reference - foot note, web link.

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**Table I-2
Summary of the 1998 U.S. EPA Locomotive Emissions Standards**

Type	Tier	Date of Original Manufacture	NOx Standard (g/bhp-hr)	Percent Control When Engine is New or Remanufactured*	PM Standard (g/bhp-hr)	Percent Control When Engine is New or Remanufactured*
Line-haul locomotives	Tier 0	1973-2001	9.5	30 percent	0.60	N/A
	Tier 1	2002-2004	7.4	45 percent	0.45	N/A
	Tier 2	2005 and later	5.5	60 percent	0.20	72 percent
Switch locomotives	Tier 0	1973 - 2001	14.0	20 percent	0.72	N/A
	Tier 1	2002 - 2004	11.0	37 percent	0.54	N/A
	Tier 2	2005 and later	8.1	53 percent	0.24	67 percent

* Relative to pre-Tier 0 or unregulated locomotives.

2. ARB Locomotive and Railyard Agreements and Regulations

1998 ARB/UP/BNSF Locomotive NOx Fleet Average Agreement

In 1998, ARB staff and California's two Class I railroads, the Union Pacific Railroad Company (UP) and BNSF Railway Company (BNSF), voluntarily entered into an enforceable agreement to accelerate the introduction of the lowest emitting locomotives into California. The 1998 Agreement requires UP and BNSF to achieve a Tier 2 locomotive NOx fleet average in the South Coast Air Basin by 2010. This is a federally enforceable agreement and an approved measure in California's State Implementation Plan. This agreement requires backstop emission reductions should there be an emissions reduction shortfall by either railroad. The 1998 agreement is estimated to reduce the South Coast Air Basin locomotive NOx and PM emissions by 65 and 50 percent, respectively. UP and BNSF must fully comply with the 1998 Agreement by January 1, 2010.

2005 ARB/UP/BNSF Statewide Railroad Agreement

In 2005, ARB, UP, and BNSF voluntarily entered into another enforceable agreement to reduce diesel particulate matter (PM) emissions by about 20 percent statewide and lower diesel PM health risks in and around railyards. The 2005 Agreement required UP and BNSF to install idle reduction devices on over 400 intrastate locomotives, use at least 80 percent ultra-low sulfur diesel fuel for interstate line haul locomotives, and meet a 99 percent compliance rate for smoking locomotives. Also, the 2005 Agreement called for the preparation of 16 railyard health risk assessments (HRAs) and railyard mitigation plans. The UP Roseville Railyard HRA study was completed in 2004, and the BNSF Sheila Mechanical Railyard in Commerce was added to the 16, bringing the total railyard health risk assessments to 18. All of the 18 railyard HRAs were completed by July 2008.

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2004 ARB Regulation Requiring ARB Diesel for Intrastate Locomotives

In 2004, the ARB approved a regulation to extend CARB diesel fuel requirements to over 400 intrastate locomotives. Intrastate locomotives operate 90 percent or more of the time in California. This regulation provides up to 14 and 6 percent reductions in PM and NOx emissions, respectively. The CARB diesel fuel PM and NOx emissions reductions are in excess of the emissions reductions provided by the use of both U.S. EPA onroad ultra low (15 ppmw) and nonroad low sulfur (500 ppmw) diesel fuels. This regulation was fully implemented by January 1, 2007.

Summary of Existing Locomotive Emission Reduction Benefits

California's two agreements with the UP and BNSF railroads, the 1998 U.S. EPA locomotive rulemaking, and the CARB diesel fuel regulation for intrastate locomotives have provided substantial statewide locomotive emission reductions through 2010. See Figures I-2 and I-3 for the estimated NOx and PM emissions reductions, especially through 2010. However, growth in rail activity begins to erode the statewide locomotive emission reductions from these existing measures beginning soon after 2010.

3. 2008 U.S. EPA Locomotive Rule

The recent 2008 U.S. EPA locomotive rulemaking will provide NOx and PM emission reductions beyond the existing 1998 U.S. EPA locomotive rulemaking and ARB locomotive regulation and railroad agreements. In the 2008 locomotive rulemaking, U.S. EPA placed particular attention on PM control for existing locomotives.

Provide Federal Register citation footnote.

2008 U.S. EPA Locomotive Remanufacturing Emissions Standards

All existing Tier 0 through Tier 2 line haul locomotives will be required to meet Tier "plus" emissions standards upon remanufacture (about every 7 to 10 years). The U.S. EPA remanufacturing standards will reduce PM emissions on average by up to 50 percent. NOx control, however, was limited to about a 20 percent reduction from the remanufacturing of only Tier 0 locomotives. The U.S. EPA locomotive remanufacturing emission standards will begin as soon as certified remanufacture kits are available (as early as 2009). Locomotive remanufacturing will occur gradually over the next ten years. In 2012, new Tier 3 line haul locomotives will be required to meet what are equivalent to the Tier 2 "plus" PM emissions standards, *and cuts PM by half.*

but no later than Jan 1, 2010.

U.S. EPA New Tier 4 Line Haul Locomotive Emissions Standards

In 2015, new Tier 4 line haul locomotives will be required to meet NOx and PM emissions standards that will go beyond Tier 2 levels by 76 and 85 percent, respectively. However, due to the long operational lives of locomotives, a national Tier 4 locomotive fleet turnover will occur gradually over 30 years, or from 2015 to 2045.

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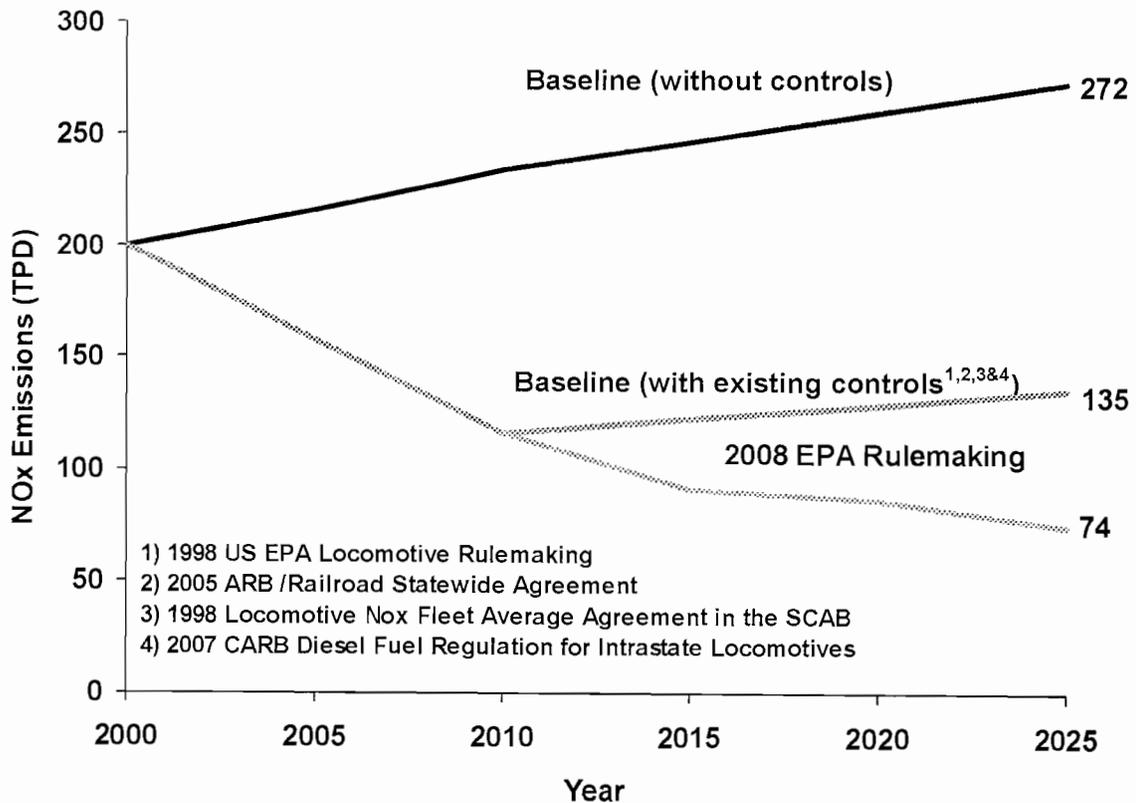
Turnover in California's locomotive fleets would be expected to occur more quickly, even without additional actions, given the significance and importance of the goods movement freight market.

Summary of Locomotive Emissions Reductions Benefits

In California, the U.S. EPA locomotive remanufacturing standards for existing locomotives, and the gradual introduction of new Tier 4 locomotives between 2015 and 2045, will provide an estimated 60 and 2 tons per day, respectively, of NOx and PM reductions by 2025. Rail growth will mean that locomotives operating in California will continue to represent an important emission source statewide, regionally, and within railyards from 2020 through 2045. *significant*

Figures I-2 and I-3 graphically illustrate statewide locomotive NOx and PM emissions and the 2008 U.S. EPA locomotive rulemaking emissions reductions through 2025.

Figure I-2
Estimated Statewide Locomotive NOx Emissions and Emission Reductions
(Tons/Day – Assumes 1 percent Annual Growth Rate)



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4. ARB Regulation for Tier 4 Off-Road New Engine Emission Standards

In 2004, the ARB and U.S. EPA adopted a fourth phase of emission standards (Tier 4). New off-road engines are now required to meet aftertreatment-based exhaust standards for PM and NO_x starting in 2011. The new Tier 4 offroad engine standards will achieve a reduction of more than 90 percent over current levels by 2020, putting off-road engines on a virtual emissions par with on-road heavy duty engines.

D. Railyard Mitigation Plans

Under the 2005 Statewide Railroad Agreement, UP and BNSF are responsible for developing mitigation plans to reduce railyard diesel PM emissions. The mitigation plans identify required and voluntary measures to reduce diesel PM emissions and public health impacts to surrounding communities.

As of November 2008, staff had reviewed eight railyard mitigation plans and also prepared preliminary calculations for the expected emission reductions for the remaining ten railyards. Based on a technical assessment of eight UP and BNSF railyard mitigation plans, staff estimates that both existing regulatory and voluntary railroad measures for the 18 railyards will provide an average reduction of over 50 percent in railyard diesel PM emissions by as early as 2010, 65 percent by 2015, and 80 percent by 2020.

1. Estimated Railyard Diesel PM Emissions 2005 to 2015

Staff estimates that existing regulatory and voluntary railroad measures will reduce railyard diesel PM emissions from 210 tons per year in 2005 to 73 tons per year in 2015. In 2015, locomotives would continue to represent the largest source of remaining railyard diesel PM emissions at about 52 tons per year. Non-locomotive sources (i.e., trucks, cargo handling equipment, TRUs, and others) would contribute to the remaining 21 tons per year. See Figure I-4 for the 2005 railyard estimated diesel PM emissions and estimated railyard mitigation plan reductions.

2. Estimated Railyard Cancer Risks in 2005

Based on the 18 railyard health risk assessments, staff determined that railyard diesel PM emissions resulted in significant local and regional excess cancer risks. Maximum individual cancer risks (MICRs) were as high as a 500 to 2,500 in a million for four railyards, 250 to 500 in a million for six railyards, and 40 to 250 in a million for eight railyards. The four Commerce railyards combined were estimated to be responsible for cancer risks in excess of 10 in a million for a population of nearly 1.3 million. The railyard diesel PM cancer and non-cancer health effects are considered significant, and will require accelerated and aggressive actions to reduce public exposure expeditiously.

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E. Key Terms

Baseline: A characterization of current conditions.

BNSF Railway (BNSF): One of two Class I railroads that operate within California. BNSF has over 6,000 locomotives (about ¼ of national locomotives) that operate within 28 states, predominately west of Chicago, Illinois.

Brake horsepower (bhp~~HP~~): Means the sum of the alternator/generator input horsepower and the mechanical accessory horsepower, excluding any power used to circulate engine coolant, circulate engine lubricant, or to supply fuel to the engine.

Captive Locomotive: A locomotive that operates within California for which more than 50 percent of annual fuel consumption, annual hours of operation, or annual rail miles traveled occur within California.

CARB Diesel: Diesel fuel formulated to meet the specification adopted in 2005 by the Air Resources Board (Sulfur: <15 ppmw; Aromatics: 10% by volume). CARB diesel is estimated to provide 14 percent PM and 6 percent NOx emission reductions beyond U.S. EPA ultra low sulfur (15 ppmw) and nonroad (500 ppmw) diesel fuels.

Cargo Handling Equipment (CHE): Container cargo, which is the most common type of cargo at ports and intermodal rail yards, requires equipment such as yard trucks, rubber-tired gantry (RTG) cranes, top picks, side picks, forklifts, and straddle carriers.

Classes or Categories of Railroads: A revenue-based definition of categories of railroads found in the regulations of the Surface Transportation Board (STB). The STB's accounting regulations group rail carriers into three classes for purposes of accounting and reporting (49 CFR Part 1201 Subpart A).

Class I Railroads: As determined annually by the Surface Transportation Board, a Class I railroad has annual gross operating revenues greater than about \$319 million (2006). There are currently seven Class I railroads operating in North America: UP, BNSF, Canadian Northern (CN), Canadian Pacific (CP), CSX, Norfolk Southern (NS), and Kansas City Southern (KCS).

Class II Railroads: As determined annually by the Surface Transportation Board, a Class II railroad has annual gross operating revenues between about \$25 and \$319 million (2006). There are two Class II railroads that operate on a regular basis in California, but are headquartered outside the state: Central Oregon and Pacific Railroad (CORP) and Arizona and California Railroad (ARCZ).

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Class III Railroads: As determined annually by the Surface Transportation Board, a Class III railroad has annual gross operating revenues less than about \$25 million (2006). There are more than twenty Class III railroads that include, but are not limited to: Pacific Harbor Lines (PHL), San Joaquin Valley Railroad (SJVRR), California Northern Railroad (CFNR), Sierra Northern Railroad (SNR), Central California Traction (CCT), Modesto Empire Traction (MET), McCloud Railway, etc.

Cost-Effectiveness: The cost of an option simply based on total capital and operational costs, over number of applicable years, divided by the NO_x and PM emissions reductions over a defined number of useful life years.

Diesel Particulate Matter (Diesel PM): The particles found in the exhaust of diesel fueled compression ignition engines. Diesel PM may agglomerate and adsorb other species to form structures of complex physical and chemical properties. In 1998, the Board identified diesel PM as a toxic air contaminant (TAC)

Diesel exhaust is a complex mixture of thousands of gases and fine particles that contain more than 40 identified toxic air contaminants (TACs). These include many known or suspected cancer-causing substances, such as benzene, arsenic and formaldehyde.

Diesel Particulate Filter (DPF): An emission control technology that reduces diesel PM emissions by directing the exhaust through a filter that physically captures particles but permits gases to flow through. Periodically, the collected particles are either physically removed or oxidized (burned off) in a process called regeneration.

Drayage Truck: Diesel-fueled, heavy-duty trucks with a gross vehicle weight rating (GVWR) of 33,000 pounds or greater. Drayage trucks transport containers, bulk, and break-bulk goods to and from ports and intermodal rail yards to other locations. ARB staff estimates that there are approximately 100,000 drayage trucks statewide, and nearly 20,000 of them frequently service ports and rail yards.

Exempt Locomotives (U.S. EPA): Pursuant to 40 CFR Part 92, any locomotive built prior to 1973, less than 1,006 horsepower, any locomotive operated by a Class 3 railroad or small business, and all electric or historic steam locomotives.

Forklifts: Used at both container facilities and bulk cargo facilities, forklifts are industrial trucks used to hoist and transport materials by means of one or more steel forks inserted under (or in the case of steel coils, in the middle of) the load. Forklifts are extremely diverse in both their size and custom cargo handling abilities. While they are designed to move and/or lift empty cargo containers or stacked or palletized cargo, they can also be designed to move or rotate (flip) truck chassis.

Forklift engines can be powered by either electric motors or internal combustion engines, such as compression ignition (i.e., diesel or natural gas) or spark ignition (i.e., gasoline or propane) engines. Compression ignition forklifts are usually designed for

most, if not all natural-gas fueled forklifts would be SI engines

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higher lift capacity than their electric or spark ignited counterparts, and are therefore more likely to be used in cargo handling operations. The cargo handling forklifts used at ports and intermodal rail yards have a horsepower range of about 45 to 280 horsepower. There are approximately 460 forklifts at California's ports and intermodal railyards.

Gen-Set Switch Locomotive: An advanced technology gen-set switch locomotive ^S has ^{have} been certified by U.S. EPA and verified by ARB as an ultra-low emitting switch locomotive (ULESL). A gen-set locomotive, to date, is powered by one or more nonroad engines of less than 1,006 horsepower, instead of one large diesel fuel powered locomotive engine.

Green Goat (Electric Hybrid) Switch Locomotive: An advanced technology battery hybrid switch locomotive that has been certified by U.S. EPA and verified by ARB as a ULESL. A Green Goat is a battery-dominant hybrid switch locomotive powered by a small generator set diesel engine of 90 to 350 horsepower. The Green Goat generator produces energy that is stored in a large bank of up to 330 lead acid batteries. This energy can be used to produce the equivalent of 1,000 to 2,000 tractive horsepower for switch locomotive operations, primarily within a railyard.

High Horsepower Locomotives: Locomotives powered by engines greater than 3,800-horsepower. Electromotive Diesel (EMD) and General Electric (GE) both build interstate line haul locomotives 4,000 horsepower or greater.

Electro-Motive

Hump Yard: A railroad classification yard in which the classification of cars is accomplished by pushing them over a summit, known as a "hump," beyond which they run by gravity, into a group of tracks below in a bowl. Each track in the bowl has been designated as a particular track for the formation of a specific train. Once the requisite number of cars are accumulated on the specific track, the locomotives are brought to couple with the line of railcars to form a completed train at the end of the bowl, or the Trim Yard.

Hybrid: The use of two or more distinct power sources to do work.

Interstate Line Haul Locomotive: Generally newer (built 1995 and later) high horsepower (greater than 3,801 horsepower) locomotives that typically operate over long distances and many states. Staff believes most interstate line haul locomotives typically operate significantly less than 50 percent of annual fuel consumption, annual hours of operation, or annual rail miles traveled within California. An interstate line haul locomotive can be designated to regional and local service, but this is the exception rather than typical practice. On a typical trip between Chicago and Los Angeles, an interstate line haul locomotive may operate in California only about 10 to 20 percent of the trip.

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Intrastate Locomotives: Locomotives that operate within California for which at least 90 percent of annual fuel consumption, annual hours of operation, or annual rail miles traveled occur within California. Intrastate locomotives are typically switch locomotives (1,006-2,300 horsepower), but a number of smaller medium horsepower locomotives (2,301 to 3,800 horsepower) locomotives can meet this definition.

Locomotive: Pursuant to 40 CFR Part 92, a self-propelled piece of on-track equipment designed for moving or propelling cars that are designed to carry freight, passengers or other equipment, but which itself is not designed or intended to carry freight, passengers (other than those operating the locomotive) or other equipment. The following other equipment are not locomotives (see 40 CFR parts 86 and 89 for this equipment):

(1) Equipment designed for operation both on highways and rails are not locomotives.

(2) Specialized railroad equipment for maintenance, construction, post accident recovery of equipment, and repairs; and other similar equipment, are not locomotives.

(3) Vehicles propelled by engines with total rated horsepower of less than 750 kW (1006 hp) are not locomotives (see 40 CFR parts 86 and 89 for this equipment), unless the owner (including manufacturers) chooses to have the equipment certified under the requirements of this part. Where equipment is certified as a locomotive pursuant to this paragraph (3), it shall be subject to the requirements of this part for the remainder of its service life. For locomotives propelled by two or more engines, the total rated horsepower is the sum of the rated horsepowers of each engine.

Low Emitting Locomotive (LEL) MHP Locomotive Engines: LEL MHP locomotive engines are advanced new four or two stroke diesel powered MHP engines that are smaller but have equivalent horsepower and are significantly less emitting, with equal or better than Tier 2 locomotive emissions levels. LEL engines have NO_x and PM emissions pursuant to 40 CFR Parts 92 and 1033 as low as 4.0 g/bhp-hr and 0.1 g/bhp-hr, respectively. Being smaller and less emitting, LEL MHP engines may potentially enable the use of DPF and SCR retrofits in the future.

Low Horsepower Locomotives: Locomotives powered by engines less than 1,006-horsepower and subject to 40 CFR Part 89 offroad engine emissions standards. Within the rail industry, these smaller locomotives are sometimes referred to as "industrial" or "critters".

Maximum Individual Cancer Risk (MICR): MICR is the estimated probability of a potential maximally exposed individual contracting cancer as a result of residential exposure to toxic air contaminants over a duration of 70 years.

Medium Horsepower (MHP) Locomotives: Typically, older locomotives powered by a single medium speed diesel fueled engine rated between 2,301 and 3,800 horsepower. Staff believes there are three subcategories of MHP locomotives: 1) 2,301 to 2,999 horsepower - typically large switchers and local road service, 2) 3,000 to 3,299 horsepower - typically helpers and short haulers, and 3) 3,300 to 3,800 horsepower -

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typically intrastate line haul locomotives. Many of the 3,000 or greater horsepower locomotives may have served as interstate line haul locomotives when they were initially built.

Option: A technological, operational, or physical measure that can potentially reduce locomotive and railyard emissions.

Passenger Locomotive: means a locomotive designed and constructed for the primary purpose of propelling passenger trains. In California, passenger locomotives main propulsion engine averages about 3,000 horsepower. Most passenger locomotives are also equipped with head end power (HEP) or hotel power, about a 500 horsepower onboard generator, to provide power to the passenger cars of the train for such functions as heating, lighting and air conditioning.

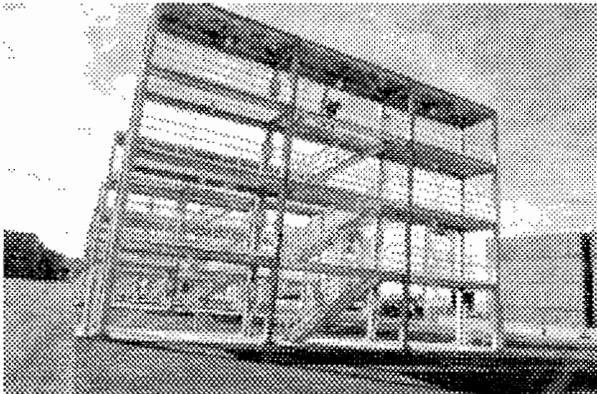
Power Assembly (Locomotive): means the components of an engine in which combustion of fuel occurs, and consists of the cylinder, piston and piston rings, valves and ports for admission of charge air and discharge of exhaust gases, fuel injection components and controls, cylinder head and associated components.

Pre-Tier 0 Locomotives: Locomotives that are expressly exempt under U.S. EPA locomotive regulations (i.e., built before 1973, less than 1,006 horsepower, owned and operated by a small business, steam, or historic) or were built between 1973 and 1999 but have not been remanufactured yet to meet U.S. EPA Tier 0 locomotive emissions standards.

Railyard: A system of tracks within defined limits provided for the making up of trains, storing of cars, and other purposes. A system of tracks branching from a common track.

Rated (Locomotive) Horsepower: means the maximum horsepower output of a locomotive engine in use.

Reefer Racks: Are electrified refrigerated cargo container racks. Containers are stacked and plugged in. The racks provide power and monitor refrigerated containers.



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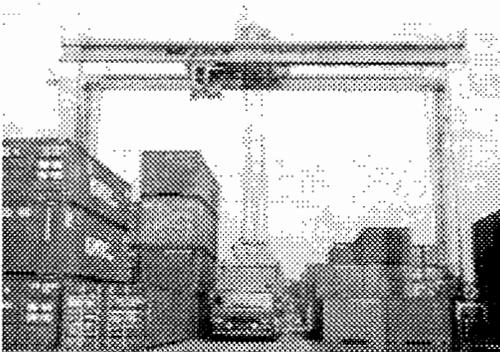
Remanufacture: Pursuant to 40 CFR Part 92.2, means:

- (1)(i) To replace, or inspect and qualify, each and every power assembly of a locomotive or locomotive engine, whether during a single maintenance event or cumulatively within a five year period; or
- (ii) To upgrade a locomotive or locomotive engine; or
- (iii) To convert a locomotive or locomotive engine to enable it to operate using a fuel other than it was originally manufactured to use; or
- (iv) To install a remanufactured engine or a freshly manufactured engine into a previously used locomotive.

Repowered Locomotive: means a locomotive that has been repowered with a freshly manufactured engine (Pursuant to 40 CFR Part 92.2).

Retrofit: In this document, an engine "retrofit" includes (but is not limited to) the addition of new and better pollution control aftertreatment equipment to diesel fueled or alternative fueled (e.g., LNG) engines.

Rubber-tired gantry cranes (RTG): Very large cargo container handlers that have a lifting mechanism mounted on a cross-beam supported on vertical legs which run on rubber tires. While the propulsion of the crane is very slow (about three miles per hour), the lifting mechanism can move quickly, and is therefore able to load and unload containers from yard trucks or from stacks at a very fast pace. RTG cranes typically have a horsepower range of about 200 to 1,000 horsepower. There are approximately 300 RTG cranes at California's ports and intermodal rail yards. UP and BNSF have about 67 RTGs at the eight largest intermodal railyards in California.



Selective Catalytic Reduction: A control technology that can convert nitrogen oxides (NO_x), with the aid of a catalyst, into diatomic nitrogen, (N₂), and water (H₂O). An SCR injects urea (32% of an aqueous solution) into the engine exhaust as ammonia (NH₃) to react with with and reduce NO_x emissions to N₂ and H₂O.

↑
The urea subsequently decomposes into water and ammonia, which...

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II. LOCOMOTIVE OPTIONS

This chapter discusses the potential options to accelerate further emission reductions from locomotives. These emissions reductions could also provide reductions in risk from exposure to diesel PM, particularly around railyards. For purposes of this analysis, we have divided locomotives into three groups: switch locomotives, medium horsepower (MHP) locomotives, and interstate line haul locomotives. The groupings represent three generally different uses for locomotives within California. The following sections describe each type of locomotive and the potential options to accelerate further locomotive emissions reductions.

There are three major categories of locomotives UP and BNSF operate in California. The first category is switch (or yard) locomotives with between 1,006 and 2,300 horsepower. The second category is medium horsepower (MHP) locomotives with between 2,301 and 3,800 horsepower. The third category is interstate line haul locomotives with between 3,801 and 6,000 horsepower.

Switch locomotives typically meet ARB's CARB diesel fuel regulation definition of an "intrastate" locomotive by operating 90 percent or more of the time in California. Many of the MHP locomotives meet the "intrastate" definition, especially smaller MHP freight and passenger locomotives. The remaining MHP locomotives typically meet the less stringent definition of "captive" by operating between 50 and 90 percent of the time within California. Finally, interstate line haul locomotives typically operate less than 50 percent of the time within California. An interstate line haul locomotive on a typical run from Chicago to Los Angeles may operate within California only about 15 percent of the trip. There are examples where a few interstate line haul locomotives have been assigned to operate in a particular area within California, but this is the exception rather than the norm.

A. Switch Locomotives

Switch locomotives are primarily used to put rail cars together to form trains within or around a railyard. They are also referred to as "yard" locomotives or "switchers." Switchers primarily have four axles to allow for a tight-turning radius within railyards. However, larger switchers that put larger trains together can employ up to six axles (e.g., hump and trim switchers).

1. *Types of Switch Locomotives*

U.S. EPA defines a switch locomotive as having between 1,006 and 2,300 horsepower. Larger switch locomotives that typically range between 2,000 and 2,300 horsepower in California may also be used, to a certain extent, for local short haul service. Switch locomotives less than 1,006 horsepower are referred to as "industrial" or "critters" and are expressly exempt from U.S. EPA locomotive emissions standards. Industrial locomotives are not addressed in this document as there only about 100 operating in

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switch locomotives, it is unlikely that many of these remaining 103 older UP and BNSF switch locomotives will be remanufactured to meet the U.S. EPA Tier 0 emissions standards.

Not really. Basically unchanged. No x

Compared to pre-Tier 0 or unregulated switch locomotives, Tier 0 engines are approximately 20 percent cleaner for NOx emissions, but were allowed under the 1998 U.S. EPA locomotive regulations to have higher PM emissions as a tradeoff for the NOx benefits. While an improvement over pre-Tier 0 switch locomotives, Tier 0 locomotives are still considerably dirtier than currently available options as discussed below.

Gen-Set Switch Locomotives

In recent years, a new switch locomotive technology has been pioneered in California and Texas that involves the use of two or three smaller offroad engines mounted on the same chassis to replace a single diesel engine. These new switch locomotives are referred to as gen-set switch locomotives and are much lower emitting than existing older switch locomotives.

nonroad and deployed

In California,

UP currently operates 70 intrastate gen-set ULESs, of which 61 are operating in the South Coast Air Basin, 5 in the San Joaquin Valley, and 4 at UP Roseville. BNSF currently operates 6 intrastate gen-set ULESs, which are assigned to the Bay Area.

→ mention additional units in Texas - collectively, a bunch of old switch locos have been replaced.

EPA

Manufacturers build gen-set switch locomotives with Cummins, Deutz, or Caterpillar Tier 3 nonroad engines. National Railway Equipment Company (NREC) and Railpower (RP) combined have built over 250 new gen-set switch locomotives since 2005. In addition, Motive Power Inc. (MPI), Caterpillar/Progress Rail (PR), and Brookville Corporation have all recently built prototypes of three engine gen-set switch locomotives. The three engine gen-set switch locomotive prototypes are currently being evaluated in field testing.

all with EPA Tier 3 nonroad diesel engines.

Gen-set switch locomotives can incur initial additional operational costs. As with the transition to most new technologies, there can be a reduction in operational times versus existing switch locomotives. The operational costs should be reduced as manufacturers and railroad personnel gain more experience with gen-set locomotives.

Gen-set switch locomotives can also provide cost-savings. Gen-set switch locomotives can reduce diesel fuel consumption, as compared to older switch locomotives, by 20 to 40 percent. The fuel savings can potentially offset a portion of the initial capital costs over a 30 year life. The cost-savings would not offset the need for new nonroad engine repowers, estimated to occur about every 15 years.

You may want to mention that state (CA+TX) emission reduction incentive \$ have paid for a lot of these locos. Compile & report how many, how much \$, and the \$/ton in CA + TX. Compelling story, and sets the stage to compare other options presented in the report.

12/22/08

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late 1990's or even into 2000+. Fact check.

Liquefied Natural Gas Switch Locomotives

Morrison Knudsen, now Motive Power, built four liquefied natural gas (LNG) switch locomotives in the early 1990s. UP owned two of the LNG switch locomotives, but transferred ownership to BNSF in the mid-1990s. As a result, all four of the LNG switch locomotives are operated by BNSF in the Los Angeles area. BNSF's four LNG switch locomotives are the only active operating LNG switch locomotives in the United States.

Battery Electric Hybrid Switch Locomotives (Green Goats)

Railpower built more than 65 Green Goats, or diesel charged battery-electric hybrids, over the past three years. The Green Goats are being operated in different parts of the country, but primarily in California and Texas. Recently, UP and BNSF shifted predominately to the purchase of gen-set switch locomotives over the battery-electric hybrid switch locomotives, largely due to the greater gen-set operational capabilities and flexibility. The Green Goats are primarily limited to light-duty applications due to the relatively quick draw down of battery stored power under heavier workloads, and the time needed to recharge the Green Goat's 330 lead acid batteries. With a recent set of Green Goat battery fires (five of the 65 units), some railroads chose to convert some of the Green Goats to gen-set switch locomotives. Railpower repaired all of the remaining Green Goats, and have returned all of them to their former service (e.g., UP returned all 11 Green Goats to service in California). There are twelve Green Goats operating in California. UP has ten operating in the South Coast Air Basin and one in the San Joaquin Valley; BNSF has one operating in the South Coast Air Basin. A summary of the types of switch locomotives operating in California and the South Coast Air Basin in 2008 is presented in Table II-1.

+ upgraded

**Table II-1
Summary of the Types of Switch Locomotives
Operating in California and the South Coast Air Basin in 2008**

^ BY BNSF & UP ?

NOT PHL, Industrial, etc., right?

Type of Locomotives	Number of Locomotives	
	California	South Coast Air Basin
Existing Switch Locomotives		
Pre-Tier 0 Manufactured Before 1973	40	19
Pre-Tier 0 Manufactured 1973 or Later	63	15
Pre-Tier 0 Remanufactured to Tier 0	49	29
Subtotal	152	63
Ultra Low-Emitting Switch Locomotives		
Gen-Set Diesel	76	61
LNG-Powered	4	4
Battery Electric	12	11
Subtotal	92	76
Total	244	139

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4. Summary of Options to Reduce Emissions from Switch Locomotives

Staff has identified four potential options to reduce emissions from switch locomotives. These options are summarized below and described in more detail in the following sections.

Option 1: Replace Existing Switch Locomotives with ULESLs

The first option would be to replace the 152 older existing intrastate switch locomotives with ULESLs. The gen-set, battery-dominant electric hybrid (Green Goats), and LNG ULESL switch (yard) locomotives are technically feasible, thoroughly tested in-use, and commercially available. However, this evaluation is based on using gen-set ULESLs due to their current market dominance and efficacy in California's Class I railroad operations. Upon completion of this option, UP and BNSF would have an estimated 244 ULESLs. Of the 244 ULESLs, 228 would be gen-sets, 12 would be electric hybrids or Green Goats, and 4 would be LNG switchers.

Option 2: Retrofit Gen-Set Switchers with NOx and PM Emission Controls

The second option builds upon the first option. In this option, the 244 ULESLs would be retrofitted with emission control devices to reduce the emissions of NOx and PM. The emission control devices would likely be either diesel particulate filters (DPF) for PM and selective catalytic reduction (SCR) for NOx. The DPF and SCR retrofit emissions reductions would be in addition to the 244 ULESLs emissions reductions.

Staff estimates that the ULESLs will need engine overhauls about every seven years. A DPF and SCR could be retrofitted onto the ULESL when it comes in to the mechanical shop for an engine overhaul. The DPF and SCR would need to be ARB verified for ULESLs, and also be commercially available. Both DPF and SCR ARB verification and commercial availability could potentially occur within the next seven years. The DPF and SCR retrofits could enable the 244 ULESLs to approach or meet the U.S. EPA Tier 4 switch locomotive emissions standards.

Option 3: Upgrade Tier 3 Nonroad Gen-Set Switchers to Tier 4 Nonroad Engines

The third option would be to replace the 244 Tier 3 nonroad engine ULESLs that had also been retrofitted with both DPF and SCR, with a new Tier 4 nonroad engine. By 2015, a Tier 4 nonroad engine would be built and equipped with both DPF and SCR. Staff estimates that switch locomotive Tier 3 nonroad engine repowers may be needed about every 15 years. In this option, the 244 captive ULESLs may need to have the Tier 3 nonroad engines repowered for the gen-sets, Green Goats, and LNGs. Rather than repower the Tier 3 nonroad engine ULESLs with new Tier 3 nonroad engines, and DPF and SCR retrofits, the ULESL switch locomotives could be upgraded to cleaner new Tier 4 nonroad engines. Tier 4 nonroad engines may be able meet emissions levels significantly below the U.S. EPA Tier 4 switch locomotive emissions standards.

Alternatively - Option 1 = gensets then, do not retrofit with DPF+SCR, but wait for first overhaul @ 5-7 year point, then replace gensets with Tier 4 nonroad engines, presumably with OEM SCR+DPF.

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Option 4: Remanufacture Older Switch Locomotives to Meet New U.S. EPA Tier 0 "Plus" Locomotive Emissions Standards

In this option, the remanufacture of the 152 captive older UP and BNSF switch locomotives would be accelerated and expanded to meet U.S. EPA Tier 0 "plus" remanufacture emission standards (See Table II-4). In 2008, staff estimates that UP and BNSF have 103 pre-Tier 0 and 49 Tier 0 switch locomotives. This would be a less aggressive and less costly approach.

**Table II-4
2008 U.S. EPA Switch Locomotive NOx Emission Standards**

Type	Tier	Date of Original Manufacture	Existing NOx Standard (g/bhp-hr)	New "Plus" NOx Standards New and Remanufactured (g/bhp-hr)	Percent Control When Engine is New or Remanufactured
Switcher locomotives	Pre-Tier 0	Pre-1973 and 1973-1999**	17.4 *	N/A	32 percent (vs. Tier 0 plus)
	Tier 0	2000-2001 and 1973-1999 **	14.0	11.8	16 percent
	Tier 1	2002 – 2004	11.0	11.0	0 percent
	Tier 2	2005-2011	8.1	8.1	0 percent
	Tier 3	2011	N/A	5.0	48 percent (vs. Tier 2)
	Tier 4	2015	N/A	1.3	84 percent (vs. Tier 2)

Note: In most cases, gen-set and electric hybrid switchers have been U.S. EPA NOx emissions certified at levels below 3.0 g/bhphr, without aftertreatment. The LNG units have certification test data below 3.0.

* This is estimated average in-use NOx emissions levels by U.S. EPA in 1998. In-use NOx emissions were estimated to range from 11 to 33 g/bhp-hr.

** 1973-1999 were not built as Tier 0, but can be remanufactured to Tier 0.

???

drop

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Table II-5
2008 U.S. EPA Switch Locomotive PM Emission Standards

Type	Tier	Date of Original Manufacture	Existing PM Standards (g/bhp-hr)	New "Plus" PM Standards Remanufactured or New (g/bhp-hr)	Percent Control When Engine is New or Remanufactured
Switcher locomotives	Pre-Tier 0	Pre-1973 and 1973-1999 **	0.41*	N/A	37 percent
	Tier 0	2000-2001 and 1973-1999 **	0.72	0.26	64 percent
	Tier 1	2002-2004	0.54	0.26	48 percent
	Tier 2	2005-2010	0.24	0.13	54 percent
	Tier 3	2011	N/A	0.10	58 percent (vs. Tier 2)
	Tier 4	2015	N/A	0.03	87 percent (vs. Tier 2)

Note: In most cases, gen-set, electric hybrid, and LNG switchers have certification test data at levels below 0.15 g/bhp-hr, without aftertreatment.

* This is estimated average in-use PM emissions levels by U.S. EPA in 1998. In-use emissions PM emissions were estimated to range from 0.2 to 1.0 g/bhp-hr.

** 1973-1999 were not built as Tier 0, but can be remanufactured to Tier 0.

Table II-6 summarizes the four switch locomotive options based on technical feasibility, potential emissions reductions, costs, and cost-effectiveness. The following sections provide the basis for the information in this table.

- What about Oxidation catalysts on Existing EMD roots-blown switchers?
 $\approx 30-50\%$ PM reduction, even on T0⁺
- What about DPF Retrofits Like WP41378 + BNSF3703?
 - Recall BNSF3703 has a lower NOx injector installed also.

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**Table II-6
Options to Further Reduce Emissions from Switch Locomotives**

Options	Switch Locomotive Options	Timeframe	NOx (tons/day)	PM (tons/day)	Cost-Effectiveness (NOx+PM)	Capital Costs (millions)
1	Replace 152 older switchers with new ULESLs (\$1.5m/unit)	Near Term (up to 5 years)	6.6	0.30	\$2-5/lb	\$230
2	Retrofit 244 ULESLs with DPF and SCR (\$200k/unit)	Mid Term (up to 10 years)	1.0	0.04	\$3-7/lb	\$50
3	Repower 244 ULESLs new Tier 4 nonroad engines (\$200k additional costs vs Tier 3)	Long Term (up to 15 years or more)	0.6	0.01	\$5.50-11/lb	\$50
SUBTOTAL			8.2	0.35	\$2-11/lb	\$330
4	Accelerate the remanufacture 152 pre-Tier 0 (103) and Tier 0 (49) switchers to meet Tier 0 plus standards *	Near Term (up to 5 years)	2.2**	0.22**	\$1-2/lb	\$38

* May take up to 20 years for an older switch locomotive to be remanufactured versus a gen-set switcher remanufacture of about every seven to ten years. ** Assume Tier 0 switchers will be remanufactured to Tier 0 plus standards upon remanufacture and there would not be any accelerated or surplus emissions reductions. This would reduce potential emissions reductions by at least one-third.

*Said
15 years
earlier.*

5. Analysis of Option 1 – Replacement of Existing Switch Locomotives with Tier 3 Nonroad Gen-Set Switch Locomotives

Technical Feasibility

Manufacturers currently build gen-set switch locomotives with new Tier 3 nonroad engines either from Cummins, Deutz, or Caterpillar. Since 2005, National Railway Equipment Company (NREC) and Railpower (RP) combined have built over 250 new multiple nonroad engine gen-set switch locomotives nationally. Currently, UP and BNSF operate about 76 gen-set switch locomotives in California, as well as a large number in Texas and other states.

Most new gen-set switch locomotives are three nonroad engine packages, but there are also a small number of two and single engine packages. The smaller engine packages are primarily designed for lighter-duty applications and smaller Class 3 and military and industrial railroads.

Motive Power Inc. (MPI), Caterpillar/Progress Rail (PR), and Brookville Corporation also recently built Tier 3 nonroad engine (three) gen-set switch locomotive prototypes. The gen-set switch locomotive prototypes are currently being evaluated in field testing.

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Also, efforts are underway to develop a single medium speed engine for switch locomotives that could also achieve ULESL emission levels.

The gen-set, electric hybrid, and LNG ULESL switch (yard) locomotives are technically feasible, thoroughly tested in-use, and commercially available. However, we will focus this evaluation on gen-set ULESL switch locomotives due to their current market dominance and efficacy in California's Class I railroad operations.

To date, there have been significant reductions from the ULESLs that have already replaced existing switch locomotives. Table II-7 presents the emission reductions that have already been achieved from the 92 ULESLs.

**Table II-7
Estimated Emission Reductions Already Achieved from
the Existing 92 ULESL Switch Locomotives**

Location	ULESL* Switchers	Emission Reductions (tons per day)		Costs (millions)
		NOx	PM	
South Coast	76	3.6	0.17	\$114
Rest of State	16	0.7	0.03	\$24
Statewide	92	4.3	0.20	\$138

* ULESLs: 80 gen-sets, 12 electric hybrids, and 4 LNG locomotives.

Potential Emission Reductions

New Tier 3 nonroad engine gen-set switch locomotives are at or below existing ULESL NOx emission levels of 3.0 g/bhp-hr. In addition, gen-set ULESL switch locomotives ~~meet or exceed~~ PM emission levels of 0.1 g/bhp-hr. Gen-set switch locomotives also consume 20 to 40 percent less diesel fuel than older medium speed single-engine switch locomotives, providing greenhouse gas emissions reductions. With the use of CARB diesel, the ULESLs provide a reduction in both PM and NOx emissions, respectively, over pre-Tier 0 switch locomotive emissions of about 85 percent.

Potential emission reductions are calculated based on a change in the expected emission factors for gen-set locomotives versus pre-Tier 0 locomotives, or Tier 0 locomotives. These emission factors are presented in Table II-8.

exceed could mean are greater than.

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Table II-8
Emission Factors Used to Determine
Potential Emission Reductions for Option 1

NOx is not really this high.

Type of Locomotive	Number of Locomotives	Emission Factors (g/bhp-hr)	
		NOx	PM
Pre-1973 Switchers	41	17.4	0.72
Pre-Tier 0 Switchers	62	17.4	0.72
Pre-Tier 0 Switchers Remanufactured to Tier 0	49	14.0	0.72
<i>In Use testing</i> Subtotal	152		
ULESL (Tier 3 Nonroad Engine)	152	3.0	0.10

certification database

Probably higher than actual - check cert database.

The potential emission reductions can be determined using the U.S. EPA emission factors. As Table II-9 shows, replacement of the 152 remaining older intrastate UP and BNSF switch locomotives, with new Tier 3 nonroad engine gen-set ULESLs, could provide additional statewide NOx and PM reductions of about 6.4 and 0.30 tons per day, respectively, beyond current UP and BNSF switch locomotive emissions levels.

Table II - 9
Estimated Potential Emission Reductions From Replacement of
152 Remaining Older UP and BNSF Switch Locomotives
With New Gen-Set Switch Locomotives
(Option 1)

Location	Total # of Older Switcher	Pre-1973 Switcher (Exempt)	Pre-Tier 0 Switcher (1973-1999)	Tier 0 Switcher (1973-1999) *	Emission Reductions	
					NOx (tons/day)	PM (tons/day)
South Coast	63	19	15	29	2.8	0.14
Rest of State	89	21	48	20	3.8	0.16
Statewide	152 **	40	63	49	6.6	0.30

* There are three pre-1973 switch locomotives that have been remanufactured to Tier 0.
** At up to \$1.5 million per ULESL, total capital costs estimated to be up to \$228 million.

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Costs

A new Tier 3 nonroad engine gen-set ULESL switch locomotive can reach total costs of up to \$1.5 million. Therefore, to replace 152 existing switch locomotives with gen-set switchers could cost as much as \$230 million. Details on the costs are presented below.

A single Tier 3 nonroad engine can cost about \$50,000. However, adding a new generator, auxiliary generator, cooling system, and other key parts to complete a total "skid mounted engine package" can cost up to \$200,000. As a result, a "three engine" gen-set skid mounted package, to provide the propulsion power for a three engine gen-set switch locomotive, can cost between \$500,000 and \$600,000.

There are additional costs beyond the three engine gen-set package. For example, a control system is needed to serve as the brain to alternate the work evenly over the three engines in the gen-set package. The engine control system can cost between \$100,000 and \$150,000. A new locomotive cab to meet federal safety standards can cost about \$100,000. New traction motors and wheels can cost about \$100,000. Onboard equipment such as a GPS, event recorder, and data loggers can also add to the costs. Depending on whether an existing switch locomotive chassis is used, or a new one is built, costs can vary by up to \$200,000 or more. All of these costs above combined can add up to as much as \$1.5 million for a new gen-set switch locomotive.

With nonroad engine gen-set switch locomotives, railroads can incur significant future engine repower costs. High speed nonroad engines, being worked under the rigors of a locomotive duty cycle, are not designed or built with the life-time durability of a single medium speed locomotive engine. Currently, manufacturers and railroads mechanical staff estimate that the gen-set switch locomotives powered by Tier 3 nonroad engines may need to be completely overhauled every seven years, and the engines repowered about every fifteen years.

A medium speed locomotive engine can operate for 50 years or longer. However, a medium speed engine will need to be remanufactured or rebuilt with new fuel injectors, power assemblies, and other components about every seven to ten years at a cost of about \$150,000 to \$200,000 per remanufacture.

Cost Effectiveness

Cost-effectiveness to replace an older pre-Tier 0 or Tier 0 switch locomotive, with a new ULESL gen-set switch locomotive ranges from \$2 to \$5 per pound. This assumes the gen-set switch locomotive engines operate for at least ten years, and possibly up to 20 years, before there is a need for complete engine repower. A new ULESL gen-set switch locomotive replacement is very cost-effective when compared to other ARB control measures or options. Details of the cost-effectiveness calculations are presented in Appendix E.

PRELIMINARY DRAFT

6. Analysis of Option 2 – Retrofit of Gen-Set Switchers with NOx and PM Emission Controls

Technical Feasibility

Technical feasibility is an issue for this option. Neither the ARB nor the U.S. EPA has verified any aftertreatment control technologies for PM or NOx on switch locomotives. These control technologies include diesel particulate filters (DPF) for PM or selective catalytic reduction (SCR) for NOx. However, as a mid-term option, DPF and SCR aftertreatment retrofits for use on nonroad engines should be available by as early as 2011 [Appendix E summarizes the status of research efforts on locomotive aftertreatment emission controls.]

do either of these belong here?

gen-set

for gen set switch locomotives E- it's calcs for switch locos. C?

Nonroad engine manufacturers such as Cummins, Deutz, and Caterpillar are already designing and testing aftertreatment systems to meet the future Tier 4 nonroad engine standards. The emphasis is being placed on DPFs, as the federal Tier 4 nonroad PM standard, and the need for DPFs, becomes effective in 2011. SCR NOx control is more technically challenging, but there is also more time to address the Tier 4 nonroad standard for NOx, with the latter being phased-in between 2011 and 2014. However, existing nonroad engine aftertreatment retrofit systems, like DPF and SCR on Tier 3 nonroad engines, will most likely take a lower priority to designing aftertreatment systems for the new Tier 4 nonroad engines. ^ by the engine OEM's

Staff believes that retrofitting aftertreatment systems onto Tier 3 nonroad engines could potentially affect engine performance, and the aftertreatment could be subject to ongoing operational and maintenance problems. However, in spite of these potential technical challenges, DPF and SCR retrofits may be able to achieve significant potential cost-effective emissions reductions on ULESLS. As a result, it is important to explore this option to provide interim emissions reductions until new Tier 4 nonroad engines, equipped with DPF and SCR, become commercially available by about 2015.

Based on discussions with engine manufacturers and the railroads, staff estimates that gen-set switch locomotives will need engine overhauls about every seven years. This would provide a potential opportunity to retrofit DPF or SCR, or both, onto Tier 3 nonroad engines in gen-set switch locomotives as part of a normal locomotive maintenance schedule.

Staff believes ARB verification and commercial production of both DPF and SCR retrofits could potentially be achieved for ULESL switch locomotives within the next couple of years. Based on discussions with ULESL manufacturers and ARB research efforts, staff believes DPF retrofits for ULESLS could receive ARB verification and become commercially available as early as 2010. SCR retrofits for ULESLS would probably not be ARB verified and commercially available until 2012 or later.

→ Note that gen-set engine operation is conducive to DPF+SCR, even given relatively overall load factor of switch cycle, because of multi-engine nature of loco.

PRELIMINARY DRAFT

Potential Emissions Reductions

Table II-10 presents the staff estimates of the changes in emission factors that would be achieved by retrofitting gen-set switch locomotives with DPF and SCR emission controls.

**Table II-10
Emission Factors Used to Determine
Potential Emission Reductions
(Option 2)**

Type of Locomotive	Number of Locomotives	Emission Factors (g/bhp-hr)	
		NOx	PM
ULESL (Tier 3 Nonroad Engine)	244	3.0	0.10
ULESL (with DPF and SCR)	244	1.3	0.03

The retrofit of both DPF and SCR onto ULESLs could approach or meet Tier 4 emissions levels. As shown in Table II-11, Option 2 could provide an additional 1.0 and 0.04 tons per day of NOx and PM statewide, respectively, beyond ULESL replacement of 152 switch locomotives. Of the potential statewide emissions reductions, over half would be achieved in the South Coast Air Basin.

on the high side. stretch goal of 0.5/0.01

**Table II-11
Estimated Emission Reductions from
Retrofit of DPF and SCR onto 228 Gen-Set, 12 Electric Hybrid,
and 4 LNG ULESL Switch Locomotives
(Option 2)**

Location	Retrofit ULESL Switchers	Emission Reductions (tons per day)		Costs (millions)
		NOx	PM	
South Coast	139	0.6	0.02	\$28 *
Rest of State	105	0.4	0.02	\$21
Statewide	244	1.0	0.04	\$50 *

* May not add up precisely due to rounding.

PRELIMINARY DRAFT

Costs

A DPF and SCR retrofit of a gen-set switch locomotive powered by a Tier 3 nonroad engine is estimated to cost about \$200,000. Retrofitting 244 ULESLs with DPF and SCR could cost about \$50 million. Details on the derivation of the \$200,000 retrofit costs are presented below.

Retrofit of both DPF and SCR onto Tier 3 nonroad engine ULESL gen-set or electric hybrid switch locomotives would cost about \$200,000 per three engine gen-set switch locomotive. These initial estimates are based on conversations with nonroad engine and gen-set locomotive manufacturers.

Cost-Effectiveness

If you specify DPF+SCR in the new 244 locomotives, is it still considered a "retrofit"?

A UP and BNSF captive ULESL gen-set switch locomotive fleet, powered with Tier 3 nonroad engines, as compared to 152 pre-Tier 0 or Tier 0 switch locomotives, could provide NOx and PM emissions reductions of up to 6.4 and 0.3 tons per day, respectively. In comparison, retrofitting a Tier 3 nonroad engine ULESL switch locomotive, with both DPF and SCR, could provide additional NOx and PM emissions reductions of only up to 1.0 and 0.04 tons per day, respectively.

Replacement of pre-Tier 0 switch locomotives with Tier 3 nonroad engines provides an incremental reduction in mass emissions that is nearly ten times higher than retrofits of Tier 3 nonroad engines both DPF and SCR. However, the *incremental* cost differences are substantially lower for the retrofit of both DPF and SCR on the Tier 3 nonroad engine, at about an estimated additional \$200,000, versus a new Tier 3 nonroad engine gen-set switch locomotive that could cost up to \$1.5 million.

Both DPF and SCR retrofitted to an existing three engine Tier 3 nonroad package may cost an additional or incremental cost difference of about \$200,000. We estimate the cost-effectiveness for a retrofit of both DPF and SCR onto a Tier 3 nonroad three engine package, to be between \$3 and \$7 per pound, depending on a 10 to 20 year range of useful life.

7. Analysis of Option 3 – Upgrade Gen-Set Switchers to Tier 4 Nonroad Engines

Technical Feasibility

Initial estimates indicate that new gen-set ULESLs built with Tier 3 nonroad engines will require repowers with new nonroad engines about every 15 years, depending on individual locomotive workloads. The frequency of engine repowers is anticipated because nonroad engines are high speed (about 1,800 rpm) and are not designed or built with the durability of a medium speed (about 1,000 rpm) engine. Medium speed engines can operate in a locomotive for up to 50 years or more.

PRELIMINARY DRAFT

New gen-set ULESLs are predominately powered by three Tier 3 nonroad engines, with each engine rated at less than 750 horsepower, and the total three engine package roughly equivalent to about 2,000 horsepower.

UP ordered and assigned 61 gen-set switch locomotives to the South Coast Air Basin in 2007; in 2008 four more were assigned to UP Roseville and five to the San Joaquin Valley. Also, BNSF ordered and assigned 6 gen-sets to the Bay Area in 2008. All of the 76 UP and BNSF gen-set switch locomotives may be due for complete nonroad engine repowers in about 15 years. In addition, the 12 electric hybrids are powered by Tier 2 or 3 nonroad engines, usually between 90 and 300 horsepower, that could be upgraded to Tier 4 nonroad engines.

The U.S. EPA and ARB Tier 4 nonroad engine standards should be fully implemented for NOx and PM by 2015. U.S. EPA and ARB require Tier 4 nonroad engines to be phased in between 2011 and 2015. Tier 4 nonroad engines of less than 750 horsepower are expected to be built with diesel particulate filters (DPF) by 2011, and selective catalytic reduction (SCR) between 2011 and 2014. New Tier 4 nonroad engine repowers, when the Tier 3 nonroad gen-set switch locomotives engines need to be repowered, should be technically feasible, thoroughly tested, and commercially available as early as 2015.

Potential Emission Reductions

[maybe rebuild existing fleet of switchers to T₀ now, then buy new gensets with T₄ nonroad engines in 2014. Relocate T₀ engines elsewhere on system.] ★

Tier 4 nonroad engine repowers could provide greater emissions reductions than Tier 3 nonroad gen-set ULESL switch and electric hybrid locomotive engines retrofitted with both DPF and SCR. The latter would be equivalent to U.S. EPA Tier 4 locomotive emissions levels of 1.3 g/bhp-hr NOx and 0.03 g/bhp-hr PM. Tier 4 nonroad engine emission standards are even more stringent at 0.3 g/bhp-hr NOx and 0.01 g/bhp-hr PM.

As shown in Table II-12, a Tier 3 nonroad engine retrofitted with DPF and SCR could approach or equal U.S. EPA Tier 4 locomotive emissions standards. New Tier 4 nonroad engine repowers could lower these emissions levels further, as Tier 4 nonroad emissions standards represent a reduction of about 77 percent for NOx and about 65 percent for PM over Tier 4 locomotive emission levels. As shown in Table II-13, however, the actual mass emission reductions are substantially less than those achieved with Option 1 – ULESL switch locomotive replacements.

The Tier 4 nonroad engine repowers, with Tier 4 nonroad emissions levels applied to 244 ULESLs powered with Tier 3 nonroad engines and retrofitted with DPF and SCR, could provide additional NOx and PM statewide emissions reductions of up to 0.6 and 0.01 tons per day, respectively. See Table II-13 for further details on the Tier 4 nonroad engine repowers that could potentially provide additional emissions reductions beyond a gen-set switch locomotive retrofitted with both SCR and DPF.

PRELIMINARY DRAFT

Table II-12
Emission Factors Used to Determine
Potential Emission Reductions
(Option 3)

Type of Locomotive	Number of ULESL Switch Locomotives	Emission Factors (g/bhp-hr)	
		NOx	PM
ULESL (retrofitted with DPF and SCR) ^{Tier 3 nonroad engines}	244	1.3	0.03
ULESL (repowered with Tier 4 nonroad engines and equipped with DPF and SCR)	244	0.3	0.01

Should be able to do better than this.

Table II-13
Estimated Emission Reductions from Repowering ULESL
with Tier 4 Nonroad Engines Equipped with DPF and SCR
(Option 3)

Location	Repower ULESLs with Tier 4 Nonroad Engines	Emission Reductions (tons per day)		Incremental Costs (millions)
		NOx	PM	
South Coast	139	0.3	0.006	\$28 *
Rest of State	105	0.3	0.004	\$21 *
Statewide	244	0.6	0.01	\$50 *

* May not add up precisely due to rounding.

Costs

earlier you said T3 nonroad engine is ~\$50K is it really going to be X4 for T4?

Repowering a Tier 3 nonroad engine, with a new Tier 4 nonroad engine equipped with DPF and SCR, is estimated to be about \$200,000. This cost would only be an incremental cost increase over the cost of a new Tier 3 nonroad engine repower. Therefore, repowering 244 ULESLs with Tier 4 nonroad engines, built with DPF and SCR, could cost about \$50 million. Details on the derivation of the \$200,000 incremental costs are presented below.

Gen-set locomotive manufacturers have indicated that a skid mounted Tier 3 nonroad engine package would include a single Tier 3 nonroad engine, new generators, new cooling systems, and other components which could cost up to \$200,000. For a "three engine" skid mounted package, these costs could add up to \$600,000. Staff assumes that the railroads would be replacing the Tier 3 nonroad engines upon repower every fifteen years.

maybe introduce term "gen set module". Replace that every 15 years. Rebuild engine @ 7 years, Change out "gen set module" @ 15 years.

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This option evaluates the incremental cost difference between a required repower with a new Tier 3 nonroad engine versus a repower with a new Tier 4 nonroad engine, the latter equipped and built with DPF and SCR.

Due to the easy design, configuration, and installation of Tier 3 nonroad engines on an existing locomotive platform, gen-set engine manufacturers believe similarly (even with DPF and SCR) that future Tier 4 nonroad engine repowers could potentially be completed within two to three workdays. This approach would significantly minimize locomotive downtime and labor costs to perform engine repowers. Staff has spoken to gen-set locomotive manufacturers who indicate they plan to be able to incorporate future Tier 4 nonroad engines onto the existing gen-set switch locomotive platforms.

Initial estimates to retrofit DPF and SCR onto Tier 3 nonroad gen-set switch locomotive engines are about \$65,000 per engine, or about \$200,000 for a three engine gen-set switch locomotive. This assumes \$200,000 per skid mounted engine package (i.e., engine plus generator package) for a three engine gen-set locomotive that would total about \$600,000. We assume adding DPF and SCR would bring the total costs to about \$800,000, or about a \$200,000 incremental cost difference.

New Tier 4 nonroad engines designed with DPF and SCR could cost less than a retrofitted aftertreatment system, but the base Tier 4 nonroad engine might be more expensive than a Tier 3 nonroad engine. To address these potentially offsetting costs, we chose to use the higher aftertreatment cost number of \$200,000. The incremental cost differential between a repower with a new Tier 4 versus new Tier 3 nonroad engine gen-set in a three engine package, is estimated to be about \$200,000.

Cost-Effectiveness

A 244 gen-set ULESL fleet powered with three Tier 3 nonroad engines, as compared to 152 pre-Tier 0 or remanufactured Tier 0 switch locomotives and 92 existing ULESLs, could provide NOx and PM emissions reductions of up to 6.8 and 0.3 tons per day, respectively. Retrofits of the 244 ULESLs with both DPF and SCR could provide an additional 1.0 and 0.04 tons per day of NOx and PM emissions reductions, respectively. Beyond both repowering 244 old switchers with new Tier 3 nonroad engine ULESLs, and retrofitting the 244 ULESLs with both DPF and SCR, new Tier 4 nonroad engines could provide additional NOx and PM emissions reductions of 0.6 and 0.01 tons per day, respectively.

what about DPF+SCR Retrofits for the existing 92 genset locos?

A new Tier 3 nonroad three engine skid mounted package would cost about \$600,000. A retrofit of both DPF and SCR on to a three engine gen-set package may cost an additional \$200,000. A new Tier 4 nonroad three engine package, built with DPF and SCR, may cost about \$800,000. There would be no cost difference between a new Tier 3 nonroad engine gen-set package that has been retrofitted with DPF and SCR and a new Tier 4 nonroad engine. The incremental cost difference would be limited to the difference between only a repower of new Tier 3 versus new Tier 4 nonroad engine, which would be about \$200,000.

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Based on the assumptions above, staff estimates the cost-effectiveness for a Tier 3 to new Tier 4 nonroad three engine package upgrade, based on the new engine cost differences, to be between \$5.50 and \$11 per pound, depending on a range of useful life between 10 and 20 years. Also, a case could be made that with no cost differential between an ULESL, retrofitted with both DPF and SCR, and a new Tier 4 nonroad engine, the cost-effectiveness would be zero. Staff has chosen to be conservative in this particular cost-effectiveness calculation.

but I thought that retrofit gave 1.3/0.03 + T4 was 0.3/0.01 ?

8. Analysis of Option 4 – Remanufacture Existing Switch Locomotives to Meet U.S. EPA Tier 0 Plus Emission Standards

Technical Feasibility

There are a couple of key issues with applying the Tier 0 plus remanufacture approach to switch locomotives. Switch locomotives are not remanufactured as often as interstate line haul locomotives (the latter about every 7 to 10 years). Switch locomotives work predominately in the lower power settings, work fewer hours, and place significantly less stress and work on their engines. As a result, switch locomotives may only be remanufactured about every 10 to 20 years.

Another issue is that the U.S. EPA switch locomotive Tier 0 plus emissions standards are applicable only to switch locomotives remanufactured to meet existing Tier 0 standards. Of UP and BNSF's captive 152 older switch locomotives, a majority (103) have not been remanufactured to meet U.S. EPA Tier 0 locomotive emissions standards.

Staff believes there may be little economic incentive for railroads to remanufacture older pre-Tier 0 switch locomotives to meet U.S. EPA Tier 0 and subsequently Tier 0 plus locomotive emissions standards. Staff is concerned that older pre-Tier 0 switch locomotives may have little, if any, residual value. As a result, it may be cost prohibitive for railroads to incur switch locomotive remanufacture costs that could potentially exceed the value of the switch locomotive. These same concerns may also apply to switch locomotives remanufactured to Tier 0.

* In most cases, the pre-Tier 0 older switch locos have the same engines

→ Staff does believe that U.S. EPA Tier 0 plus locomotive emission reduction kits could be adapted or commercially produced for pre-Tier 0 older switch locomotives if there were a sufficient market size. Further, there are about 49 captive older switch locomotives that have been remanufactured to meet U.S. EPA Tier 0 emissions standards and will be subject to the U.S. EPA Tier 0 plus requirements. Staff assumes the railroads will spend the necessary funds to remanufacture older Tier 0 switch locomotives.

is their '73 & newer counterparts be applied equally to both.

U.S. EPA recently promulgated new switch locomotive emission standards as part of the 2008 rulemaking: older locomotives that had been remanufactured to meet existing Tier 0 emission standards, and new Tier 0 units built between 2000 and 2001, are required to meet new Tier 0 plus emission standards. Under the Tier 0 plus standards,

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PM emissions could be lowered potentially from 0.72 g/bhphr to 0.26 g/bhphr, a 64 percent reduction, and NOx from 17.4 g/bhphr to 11.8 g/bhphr, a 32 percent reduction.

Staff and U.S. EPA believe the Tier 0 plus remanufacture kits could be available ~~much~~ earlier than the required date of 2010, perhaps in early 2009. However, according to U.S. EPA, the Tier 0 plus emission standards were not intended to apply to pre-Tier 0 locomotives. U.S. EPA believed most pre-Tier 0 locomotives would be significantly reduced in numbers in the near future, primarily due to retirement. Therefore, U.S. EPA intended the Tier 0 plus locomotive emission standards to apply only to locomotives built or remanufactured to meet U.S. EPA locomotive Tier 0 emission standards.

→ Again - you can apply Tot kits to G45 roots engines in these older switchers

Two-thirds (103) of UP and BNSF's 152 older captive switch locomotives are either expressly exempt (built prior to 1973) or have not been remanufactured yet (built 1973-1999) to meet U.S. EPA Tier 0 emission standards. Staff still believes Tier 0 plus emission kits could be adapted or produced for exempt or pre-Tier 0 switch locomotives in the near future. Further, staff believes many of these older locomotives will continue to operate for the foreseeable future, potentially up to another 10 to 15 years.

→ As soon as Tot kits are available, get after it!

Older switch locomotives may be remanufactured only about every 10 to 15 years, or up to 20 years in some cases. Due to remanufacturing costs, railroads may delay remanufacturing older switch locomotives until they are retired from service and not remanufacture them at all.

Potential Emissions Reductions

As discussed above, the Tier 0 plus remanufacture kits could lower pre-Tier 0 and Tier 0 switch locomotive emissions by up to 64 and 32 percent for PM and NOx, respectively. Emission factors are presented in Table II-14.

**Table II - 14
Emission Factors Used to Determine
Potential Emission Reductions for Option 4**

Type of Locomotive	Number of Locomotives	Emission Factors (g/bhp-hr)	
		NOx	PM
Pre-1973 Switchers	41	14 (17.4)	0.72
Pre-Tier 0 Switchers	62	17.4	0.72
Pre-Tier 0 Remanufactured to Tier 0	49	14.0	0.72
Subtotal	152		
Remanufactured Switch Locomotives to Tier 0 "Plus"	152	11.8	0.26

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may not be realized

As shown in Table II-15, remanufacturing 152 UP and BNSF captive switch locomotives (103 pre-Tier 0 and 49 Tier 0) to meet Tier 0 plus emissions standards would provide NOx and PM emissions reductions of about 2.2 and 0.22 tons per day, respectively. However, these potential emissions reductions could be lowered significantly if railroads decide that older switch locomotives will continue to work, via ongoing maintenance and overhauls, and to avoid the expense of remanufacturing to Tier 0 plus emissions standards.

Table II - 15
Estimated Emission Reductions from Remanufacturing 152 Pre-Tier 0 and Tier 0 Switch Locomotives to Tier 0 "Plus" Emission Standards (Option 4)

Location	Remanufacture pre-Tier 0 and Tier 0 Switchers to Tier 0 Plus	Emission Reductions (tons per day)		Capital Costs (millions)
		NOx	PM	
South Coast	63	0.80	0.09	\$16
Rest of State	89	1.36	0.13	\$22
Statewide	152	2.2 *	0.22	\$38

* May not add up precisely due to rounding.

Costs

Remanufacturing older switch locomotives to Tier 0 plus emission standards would cost about \$250,000 per remanufacture to meet Tier 0 plus emissions standards. Therefore, the total cost for 152 pre-Tier 0 and Tier 0 switch locomotives would be about \$38 million. Details on the derivation of the \$250,000 remanufacture costs are presented below.

The estimated cost to remanufacture an existing pre-Tier 0 older switch locomotive to meet Tier 0 emission levels is up to \$200,000, based on actual cost estimates provided by UP and BNSF. U.S. EPA estimated that the Tier 0 plus kits would be less than \$50,000, but these costs do not account for labor and testing costs, locomotive downtime, and necessary related parts. Staff expects that the Tier 0 plus remanufacture kit would be about the same price or slightly higher than a Tier 0 kit. Staff estimated the costs of a Tier 0 plus remanufacture kit at a slightly higher level than a Tier 0 kit, or about \$250,000.

\$50K A might be too low - maybe \$50K to \$100K range

- ~~You~~ This analysis basically charges the environment "Full Retail" for a To+ rebuild, where arguably the RRs have to do it anyway, at time of next overhaul. The discussion needs to be on how⁵² to provide incentives to rebuild a Switch Loco to To+ that could otherwise limp along at high emission rates for years.

12/22/08

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Cost-Effectiveness

Cost-effectiveness for NOx and PM emissions reductions to remanufacture an older pre-Tier 0 or Tier 0 switch locomotive with a Tier 0 "plus" switch locomotive kit is between \$1 and \$2 per pound, depending on the range of useful life of between 10 to 20 years.

B. Medium Horsepower Locomotives

Medium horsepower (MHP) locomotives are used both in freight and passenger locomotive operations. The different MHP locomotive applications are discussed below.

1. Types of MHP Locomotives

MHP Freight Locomotives

MHP freight locomotives range from 2,301 to 3,800 horsepower. Staff identified three distinct subgroups of freight MHP locomotives. Smaller freight MHP locomotives range from 2,301 to 2,999 horsepower and can serve as large switch (yard) locomotives and also perform local service. A second set of freight MHP locomotives range from 3,000 to 3,300 horsepower. This mid-size group of freight MHP locomotives generally serves as helpers by assisting trains over mountain grades or performing as local and regional short haulers. The third subgroup of freight MHP locomotives is intrastate or regional line haul locomotives. This latter category of locomotives typically moves freight up to 500 miles and ranges from 3,301 to 3,800 horsepower. For comparison, today's interstate freight line haul locomotives (e.g., Chicago to Los Angeles) are typically 4,000 horsepower or greater.

MHP freight locomotives are typically powered by six axles, though some units may be powered with 4 axles. Nearly all freight MHP locomotives were originally built within a wide range of 10 to 50 years ago. Many were originally interstate line haul locomotives (e.g., Chicago to Los Angeles) that over time were cascaded down to shorter routes and local and regional operations. The UP and BNSF freight MHP locomotive fleet operating in California is on average about 40 years old.

UP and BNSF's California captive MHP freight locomotives are predominately pre-Tier 0 and have not been remanufactured to meet U.S. EPA Tier 0 locomotive emissions standards. Many of these locomotives are also expressly exempt from U.S. EPA locomotive emission standards by being built before the 1973 model year. About 10 percent or about 40 of these older MHP line haul locomotives, especially the relatively newer ones (1985-1999 model years), may have recently been remanufactured to meet U.S. EPA Tier 0 locomotive emission standards.

40 seems too high old = 1968 build dates? I guess 25 years old.

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MHP Passenger Locomotives

Another group of MHP locomotives move passengers. California has about 110 captive or intrastate passenger locomotives that average about 3,000 horsepower, with some up to 3,600 horsepower, and use the same or similar engine families as MHP freight locomotives. California's 110 intrastate passenger locomotives on average are about 15 years old. Intrastate passenger operators include Amtrak, Metrolink, California Department of Transportation, Caltrain, Altamont Commuter Express, and North County Transit District in San Diego.

Intrastate passenger locomotives operate predominately in idle or the higher power (Notch 5-8) settings, and on average consume nearly 200,000 gallons of diesel fuel annually. Some of the intrastate passenger locomotives have been documented to consume up to 300,000 gallons or more of diesel fuel annually. Passenger locomotives also typically have large stationary generators of about 500 horsepower or more onboard to provide hotel power, such as lighting, air conditioning, etc., for passenger cars and can operate for up to 24 hours per day.

Note that about 1/2 of this is for HEP engine. yes 1/2!

Estimates of UP and BNSF Intrastate and Captive MHP Locomotives

Table II-16 presents staff estimates of the number of intrastate and captive UP and BNSF freight and passenger MHP locomotives operating statewide and within the South Coast Air Basin. These estimates are based on documentation provided by both UP and BNSF for the intrastate locomotive inventories and health risk assessment emission inventories. Also, the estimates are based on the CARB diesel fuel regulation for intrastate UP and BNSF freight and passenger locomotives. For this evaluation, the estimates of UP and BNSF freight and intrastate passenger MHP locomotives were based on an engine power range of between 2,301 and 3,800 horsepower.

**Table II - 16
Estimates of Intrastate and Captive
UP and BNSF Freight and Passenger MHP Locomotives**

Area of State	Intrastate Freight (2,301-2,999 HP)	Intrastate Freight * (3,000-3,300 HP) *	Intrastate Regional Freight (3,301-3,800 HP) **	Intrastate Passenger (3,000-3,600 HP)	Total
South Coast	20	12 ***	~65 ***	52	~150
Rest of State	83	55	~55 ***	58	~250
Statewide	103	67	~120 ***	110	~400

* EMD GP40's, SD39/40's.

** EMD GP50/GP60 (4 axle) and SD50/SD60/SD70 (6 axle).

*** Preliminary data that still needs to be confirmed with UP and BNSF.

* Note that many of the Tier 0 MHP locos might be "NO_x credit" engines, where the NO_x + PM levels are basically @ pre Tier 0 levels due to credits generated by other locomotive models.

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3. Medium Horsepower Locomotives: Statewide and Railyard Emissions

Most intrastate MHP freight and passenger locomotives are pre-Tier 0. A significant portion of these older freight locomotives are exempt from federal locomotive emissions standards by being built prior to 1973. Staff has only been able to identify about ten percent, or about 40, of the intrastate and captive UP and BNSF MHP freight and intrastate passenger locomotives that have been remanufactured to meet Tier 0 emissions levels. Freight MHP locomotives also comprise nearly one-third of UP and BNSF's 15,000 locomotive national fleet. UP and BNSF combined may operate up to 290 or more intrastate and captive freight MHP locomotives statewide.

Intrastate passenger locomotives add an additional 110 MHP locomotives to the statewide MHP locomotive fleet. About 52 operate in the South Coast and 58 in the rest of the state. All of the captive freight and passenger MHP locomotives may add up to a total of up to as much as 400 MHP locomotives statewide or more. Staff believes intrastate and captive freight and passenger MHP locomotives may contribute up to one-third of the total statewide locomotive NO_x and PM emission inventory.

4. Summary of Potential Options to Reduce Emissions from Medium Horsepower Locomotives

Staff has identified four possible options to reduce captive medium horsepower freight and passenger locomotive emissions. These options are referred to as options 5, 6, 7 and 8. In this evaluation, medium horsepower (MHP) locomotives are defined as between 2,301 and 3,800 horsepower. Based on available data, ARB staff identified only about 10 percent of the captive MHP freight and passenger locomotives that have been remanufactured to meet U.S. EPA Tier 0 locomotive emission standards.

Option 5: Repower Older Locomotives with Low-emitting Engines

The first option is to repower about 400 older pre-Tier 0 (~360) and Tier 0 (~40) MHP freight and passenger locomotives with new LEL engines. A new low emitting locomotive (LEL) engine is defined as a locomotive engine repower with new four or two stroke MHP engines that meets or exceeds 4.0 g/bhphr NO_x and 0.1 g/bhphr PM. Staff estimates that UP and BNSF have about 290 intrastate and captive MHP freight locomotives and that there are about 110 intrastate MHP passenger locomotives.

Option 6: Replace Older MHP Locomotives with New MHP Gen-Set Locomotives

An alternative to the first option is to replace up to 200 of the approximately 290 MHP freight locomotives with new gen-set MHP locomotives powered with four 700 horsepower nonroad engines, or about 2,800 horsepower. A four engine gen-set locomotive has not been U.S. EPA certified or ARB verified as of December 2008.

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Table II - 17
Options to Reduce Medium Horsepower (MHP) Locomotive Emissions

Option	Medium Horsepower Locomotive Strategies	Timeframe	NOx (tons/day)	PM (tons/day)	Cost-Effectiveness (\$/lb)	Capital Costs (millions)
5	Repower 400 older captive MHP locomotives with new LEL engines	Near Term (up to 5 years)	23.0	1.25	\$1-2 (10-20 years)	\$400
6	Replace 200 older MHP locomotives with new gen-set MHP locomotives	Near Term (up to 5 years)	13.3	0.63	\$2-4 (10-20 years)	\$400
?	Retrofit DPF and SCR onto MHP locomotives with repowered LEL engines or gen-sets	Mid Term (up to 10 years)	6.8	0.18	\$2-4 (10-20 years)	\$200
	SUBTOTAL (Options 5 and 7)	Near-Mid Term	29.8	1.43	\$1-4/lb	\$600
8	Remanufacture* 400 older MHP locomotives to meet U.S. EPA Tier 0 plus emission standards.	Near Term (up to 5 years)	13.0 **	1.0 **	\$0.50-1 (10-20 years)	\$100

Is this above + beyond To+?

Why total these? There are 400, right? Not 1200?

* May take up to 15 years for a remanufacture of an older medium speed engine MHP locomotive. Also, about 40 Tier 0 locomotives will be required to meet Tier 0 plus standards upon remanufacture.
** Assumes all existing older MHP locomotives are pre-Tier 0.

5. Analysis of Option 5 - Repower 400 Older Captive MHP Locomotives with LEL Engines

Technical Feasibility

Intrastate and captive older MHP locomotive engines provide an opportunity to achieve significant additional emission reductions by repowering them with new four or two stroke engines. The new advanced MHP locomotive engines are less emitting, smaller in size but just as powerful, and more combustion and fuel efficient than the older two stroke locomotive engines. The new advanced MHP locomotive engines emit at levels that can meet or significantly exceed the current and most stringent U.S. EPA Tier 2 locomotive NOx and PM emissions standards.

ARB We refer to the new MHP locomotive engine repowers with NOx levels at or below 4.0 g/bhp-hr and PM at or below 0.1 g/bhp-hr as low emitting locomotive (LEL) engines. LEL engine NOx and PM emissions levels represent a 70 and 85 percent reduction, respectively, when compared to pre-Tier 0 NOx and PM emission levels. Staff believes LEL engines are technically feasible and expect them to be commercially available for

Repowers

? One could argue they are available today. Ask PHL. Been running for a year now.

PRELIMINARY DRAFT

PHL units are already out there.

locomotives in the next two years. Staff expects that some LEL locomotive engine repowers could be in California operation as early as January 1, 2010.

Potential Emission Reductions

LEL engine repowers can significantly reduce existing pre-Tier 0 intrastate and captive MHP freight and passenger locomotive NOx and PM emissions by about 70 and 85 percent, respectively. MHP locomotives consume an estimated 50,000 to 300,000 gallons of diesel fuel annually. In our estimates, we assumed intrastate and captive MHP freight and passenger locomotives consume on average about 100,000 gallons of diesel fuel annually. Staff believes this to be a conservative fuel consumption level, since passenger and larger intrastate MHP line haul locomotives have been documented to consume 200,000 to 300,000 gallons of diesel fuel annually.

Based on the estimated annual activity and fuel consumption levels of 400 captive freight and passenger MHP locomotives, staff estimated statewide NOx and PM reductions of up to 24 and 1.25 tons per day, respectively. Also, note that the new LEL engine may potentially reduce fuel consumption by up to 3 percent, which could mean up to 36 tons per day of greenhouse gas emissions reductions. *per day?*

**Table II-18
Estimated NOx and PM Emissions Reductions
LEL Repowers of 400 Intrastate and Captive
Freight and Passenger MHP Locomotives**

Location	Number of MHP Locomotives	NOx (tons per day)	PM (tons per day)	Cost-Effectiveness (\$/lb)	Capital Costs (millions)
South Coast	150	8.6	0.47	\$1-2	\$150
Rest of State	250	14.4	0.78	\$1-2	\$250
Statewide	~400	23	1.25	\$1-2	\$400

* May not add up precisely due to rounding.

Costs

A new LEL engine repower of an older MHP locomotive, between 3,000 and 3,800 horsepower, would cost on average about an estimated \$1,000,000. Some engine repowers could be as low as \$500,000 and some as high as \$1,500,000. Therefore, to repower 400 locomotives would be about \$400 million.

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Cost-Effectiveness

Cost-effectiveness to repower an older pre-Tier 0 or Tier 0 MHP intrastate freight or passenger line haul locomotive with a new LEL engine could range between \$1 and \$2 per pound, depending on the range of useful life of between 10 and 20 years. A MHP locomotive repower, with a new LEL engine, is very cost-effective when compared to most current ARB control measures or options.

6. Analysis of Option 6 - Replace Up to 200 Older Captive MHP Locomotives with New MHP Gen-Set Locomotives

Technical Feasibility

Intrastate and captive older MHP locomotive engines provide an opportunity to achieve significant additional emission reductions by replacing them with new MHP gen-set locomotives. New MHP gen-set locomotives, powered by four nonroad engines, of less than 750 horsepower each, may be able to approach, meet, or exceed ultra low emitting locomotive (ULEL) emissions levels of 3.0 g/bhp-hr NOx and 0.1 g/bhp-hr PM. Current three engine gen-set switch locomotives are able meet and exceed ULESL emissions levels. ARB staff believes a four engine MHP gen-set locomotive would perform in similar duty cycles and may achieve similar levels of emissions.

ARB We refer to a new four engine (roughly equivalent to about 3,000 horsepower) gen-set locomotive, with certified emissions at or below 3.0 g/bhp-hr and PM at or below 0.1 g/bhp-hr, as a MHP gen-set locomotive. A MHP gen-set locomotive NOx and PM emissions levels represent about an 80 percent reduction when compared to pre-Tier 0 line haul locomotive NOx and PM emission levels. Staff believes MHP gen-set locomotives are technically feasible and expects four engine gen-set locomotives to be commercially available within the next one to two years. Staff expects that some MHP gen-set locomotives could be in California operation as early as 2010.

Potential Emission Reductions

New MHP gen-set locomotives could significantly reduce existing pre-Tier 0 captive MHP freight line haul locomotive NOx and PM emissions by about 80 percent. MHP freight locomotives consume an estimated 50,000 to 300,000 gallons of diesel fuel annually. *ARB* estimates we assumed captive MHP freight locomotives consume on average about 100,000 gallons of diesel fuel annually. Staff believes this to be a conservative fuel consumption level, since larger intrastate MHP line haul locomotives have been documented to consume 200,000 to 300,000 gallons of diesel fuel annually.

Based on the estimated annual activity and fuel consumption levels of 200 intrastate and captive freight MHP locomotives, staff estimated statewide NOx and PM reductions of up to 13.3 and 0.63 tons per day, respectively. Also, note that a new MHP gen-set locomotive may also potentially reduce fuel consumption by up to 20 percent or more ***

*** A lot of this fuel savings comes from comparing an older EMD w/o AESS to the gen-sets with AESS. How much of the fuel savings is from AESS, and how much from the gen-set engine efficiency?
12/22/08

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Table II - 18
Estimated NOx and PM Emissions Reductions
Replacement of 200 Captive Freight MHP Locomotives
With New MHP Gen-Set Locomotives (Tier 3 engines w/o DPF OR SCR)
 (2,301 to 3,800 horsepower)

Location	Number of MHP Gen-Set Freight Locomotives	NOx (tons per day)	PM (tons per day)	Cost-Effectiveness (\$/lb)	Capital Costs (millions)
South Coast	100	6.65	0.315	\$2-4	\$200
Rest of State	100	6.65	0.315	\$2-4	\$200
Statewide	~200	13.3	0.63	\$2-4	\$400

Costs

A new MHP gen-set freight locomotive, between 2,500 and 3,500 horsepower, could cost up to an estimated \$2,000,000. This cost estimate is based on the cost of a new three engine gen-set switch locomotive at about \$1.5 million, with a new engine and related parts, to derive a conservative estimate of \$2 million. In 2008 dollars, actual costs might be about \$1.8 million. Staff chose to be more conservative on costs, as there is currently no commercial production of a four engine gen-set locomotive. Therefore, the total estimated costs would be about \$400 million.

for 200 of these locomotives

Cost-Effectiveness

NOx + PM

Cost-effectiveness to replace an older pre-Tier 0 or Tier 0 MHP intrastate freight line haul locomotive with a new MHP gen-set locomotive could range between \$2 and \$4 per pound, depending on the range of useful life of between 10 and 20 years. A new MHP gen-set locomotive replacement of an older MHP locomotive is very cost-effective when compared to most current ARB control measures or options.

7. Analysis of Option 7 - Retrofit of DPF and SCR onto 400 MHP Freight and Passenger Locomotives Repowered with LEL Engines or Replaced with New MHP Gen-Set Locomotives

Technical Feasibility

Intrastate and captive MHP freight and passenger locomotives that have been repowered with new LEL engines, or new MHP gen-set locomotives, may be potential candidates for retrofits with DPF and SCR. LEL engines and new MHP gen-set locomotives that are retrofitted with DPF and SCR may be able to approach or meet Tier 4 locomotive NOx and PM emissions levels. The new LEL engines and MHP gen-set locomotives are expected to be more combustion efficient and smaller in size. In

with Tier 3 nonroad engines

aftertreatment size is a function of hp first, then to a lesser extent the ability of the engine to tolerate backpressure. Engine physical size has essentially nothing to do with sizing the aftertreatment system.

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addition, with significantly less engine emissions, an LEL engine and new MHP gen-set locomotive can potentially reduce the size needed for DPF and SCR aftertreatment.

Major concerns with locomotive aftertreatment devices are their sizes and weight. DPFs retrofitted onto UP and BNSF switch locomotives are the size of two pianos (2 x 1,100 pounds or more). An SCR retrofitted onto a locomotive engine has been estimated to weigh over 4,000 pounds. The SCR will also need a urea tank (about 250 gallons or more) and a urea dosing control unit to fit within the locomotive carbody. Another concern is the locomotive carbody space available to accommodate such large aftertreatment devices, and the necessary aftertreatment support equipment, is limited. The combination of a smaller, but equally powerful engine and significantly less emissions, could allow for significant aftertreatment downsizing. A smaller DOC, SCR, and DPF aftertreatment system may be able to fit within the limited locomotive carbody space.

not really. The smaller size engine permits the provides more allowable space for the aftertreatment system within the car body.

Research is currently underway by the ARB, railroads, and locomotive and engine manufacturers to assess the technical feasibility of retrofits of LEL engines with DPF and SCR. Staff is also working on a research effort to demonstrate DPFs on gen-set locomotives. Staff believes that a DPF and SCR retrofit system for either a MHP locomotive, with an LEL engine repower or gen-set technology, could be ARB verified and commercially available by as early as 2012.

Potential Emission Reductions

UP and BNSF combined may operate about 290 older MHP two stroke engine locomotives. Staff estimates about 70 older UP and BNSF MHP locomotives in the South Coast Air Basin and an additional 230 or more statewide. California also has about 110 intrastate passenger locomotives with typically two stroke Electro-Motive Diesel (EMD) engines of about 3,000 horsepower. Combined, freight and passenger captive MHP locomotives may total up to 400 statewide.

Intrastate and captive freight and passenger MHP locomotives consume an estimated 50,000 to 300,000 gallons of diesel fuel annually. In our calculations, we assumed intrastate and captive MHP freight and passenger locomotives consume an average of about 100,000 gallons of diesel fuel annually. Staff believes this to be a conservative fuel consumption level, since intrastate passenger and larger freight MHP line haul locomotives have been documented as consuming 200,000 to 300,000 gallons of diesel fuel annually.

Based on the estimated annual activity and fuel consumption levels, staff estimates that 400 intrastate and captive MHP freight and passenger locomotives powered by new LEL engines, or new MHP gen-set locomotives, could provide additional emissions reductions if also retrofitted with DPF and SCR. The additional NOx and PM reductions from the DPF and SCR retrofits could be up to 6.8 and 0.18 tons per day, respectively.

See Table II-19 for estimated emissions reductions.

Again, if new gen set locos came equipped from the builder with SCR + DPF, is it a "Retrofit"?

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Costs

Initial estimates of the costs to retrofit SCR and DPF onto an existing older freight or passenger MHP locomotive, that has been repowered with a LEL engine or replaced with a new MHP gen-set locomotive, is up to \$500,000. The DPF and SCR retrofit costs of \$500,000, would be in addition to the cost of a new LEL engine repower of about \$1 million, or replacement with a new MHP gen-set locomotive at about \$2 million.

Cost-Effectiveness

The cost-effectiveness of a retrofit of a DPF and SCR system onto an older intrastate MHP locomotive, that has also been repowered with a LEL engine or replaced with a new MHP gen-set locomotive, is between \$2 and \$4 per pound, depending on a range of useful life of between 10 and 20 years. A retrofit of DPF and SCR onto an intrastate or captive MHP locomotive, after a LEL engine repower or replacement with new MHP gen-set locomotive, is cost-effective when compared to most current ARB control measures or options.

8. *Analysis of Option 8 - Accelerate Remanufacture of 400 Pre-Tier 0 (~350) or Tier 0 (~50) Captive Freight and Passenger Locomotives to Meet U.S. EPA Tier 0 Plus Emissions Levels*

Technical Feasibility

In 2008, U.S. EPA promulgated new locomotive emission standards. The new U.S. EPA locomotive remanufacture emission standards require new and remanufactured Tier 0 locomotives to meet the more stringent Tier 0 plus emission standards. The Tier 0 plus PM line haul locomotive emission standards were lowered from 0.6 g/bhphr to 0.22 g/bhphr, a 63 percent reduction, and NOx from 13.5 g/bhphr (pre-Tier 0 NOx) or 9.5 g/bhphr (Tier 0 NOx) to 8.0 g/bhphr or 7.4 g/bhphr (Tier 0 plus NOx), or up to a 49 percent reduction. U.S. EPA and ARB staff believes certified Tier 0 plus emissions standards remanufacture kits could be commercially available by as early as 2009, and are mandatory at time of overhaul starting Jan. 1, 2010.

The Tier 0 plus option is already required by the 2008 U.S. EPA locomotive rulemaking for existing Tier 0 locomotives. However, the requirements do not apply to pre-Tier 0 line haul locomotives. This option would primarily provide benefits if Tier 0 plus emission kits become available for California's large number of pre-Tier 0 MHP locomotives. According to available data, UP and BNSF and intrastate passenger operators only have about ten percent (or about 40) of intrastate and captive MHP freight and passenger locomotives that have been remanufactured to meet the U.S. EPA Tier 0 emission standards.

* Again, how many of these are NOx credit locos?

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The extent of implementation may be dependent on how often older two stroke MHP locomotives come in for complete remanufactures. Interstate line haul locomotives are typically remanufactured every five to seven years due to the higher hours of operation, especially in the higher power settings (i.e., Notch 5-8). However, older medium speed engine MHP locomotives usually are remanufactured at a much slower pace, due to lower hours of operation and the predominate use of lower and mid power settings. Older MHP locomotives may only be remanufactured about every 10 to 15 years. Also, due to the costs of remanufacturing, which can equal or exceed the residual value of older locomotives, railroads may decide to avoid remanufacturing until the units are retired.

Potential Emissions Reductions

As discussed above, the Tier 0 plus remanufacture kits could lower pre-Tier 0 and Tier 0 MHP locomotive emissions by up to 63 and 49 percent for PM and NOx, respectively. Remanufacturing 400 pre-Tier 0 and Tier 0 MHP locomotives to Tier 0 plus emissions standards would provide NOx and PM emissions reductions of up to 13 and 1 tons per day, respectively, depending on the number of MHP locomotives not already subject to the federal Tier 0 plus requirements (about ten percent of California's MHP locomotives) and the rate of remanufactures for MHP locomotives in California.

Costs

The remanufacture of an existing pre-Tier 0 ~~older~~ MHP locomotive to Tier 0 plus emission levels could cost up to \$250,000. This estimate is based on prior costs for Tier 0 remanufacturing kits of up to \$200,000. U.S. EPA estimated that the Tier 0 plus kits would be less than \$50,000, but these costs do not account for labor and testing costs and other related parts. Staff expects that the Tier 0 plus remanufacture kits would be about the same price or slightly higher than actual Tier 0 remanufacturing costs. Therefore, we have estimated the costs of a Tier 0 plus remanufacture kit at a slightly higher level than a Tier 0 remanufacture or about \$250,000.

\$50K Δ is probably a little low.
\$50K-100K

Cost-Effectiveness

Cost-effectiveness to remanufacture an older pre-Tier 0 or Tier 0 MHP freight or passenger locomotive, with a U.S. EPA Tier 0 plus package, is estimated to be between \$0.50 and \$1 per pound, depending on the range of useful life between 10 and 20 years.

- Important point - this is the only option available now,
work could start today!

What about DOC + To+? Cut PM in $\frac{1}{2}$ again?

12/22/08

65 Ref. UP2368 - SD60 with
Miratech V-Cat.

★ Deno idea - To+ EMD SD70 + Miratech V-Cat + Blowby filter.

PM would be ≈ 0.10 g/hp-hr or even a little lower.

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C. Interstate Line Haul Locomotives

1. *Types of Line Haul Locomotives*

Freight interstate line haul locomotives typically have large diesel-electric engines of greater than 4,000 horsepower and operate on 6 axles. UP and BNSF's interstate line haul locomotives are on average about 15 years old or so. Interstate line haul locomotives are typically the newest and highest horsepower locomotives available to railroads. Interstate line haul locomotives can move the most volume of freight, most efficiently and reliably, and over the greatest distances. Interstate line haul locomotives in a consist, usually three or more locomotives, pull trains with railcars as long as one to two miles long. Interstate line haul locomotives traverse mountains, desert, and other challenging terrains as they cross the country from destinations like Chicago to Los Angeles.

2. *BNSF and UP Major Cross-Country Rail Line Routes*

The predominant California UP and BNSF interstate line haul locomotive routes are from the Ports of Los Angeles and Long Beach and Port of Oakland both to Chicago. BNSF's major southern route is from the Port of Los Angeles and Long Beach via San Bernardino and north over the Cajon Pass towards Barstow and then east to Needles, California. From Needles, the BNSF route goes north towards Winslow, Arizona and then east to Belen, New Mexico which is a major BNSF refueling depot. Ultimately, the route runs north via through Texas and to Kansas City and to as far east as Chicago. This BNSF transcontinental route is referred to as the Transcon.

UP also has a similar route which is from the Los Angeles ports via Colton, then north over the Cajon Pass and through Barstow to Yermo, California. From Yermo, the UP line runs northeast through Las Vegas and Salt Lake City. From Salt Lake City the route runs east through Rawlins, Wyoming – a major refueling depot for UP – and east past the UP Bailey Yard in Nebraska and ultimately east to Chicago. UP's southern route from the Los Angeles Ports via Colton, but then turns south to Yuma, Arizona and then east to El Paso, Texas, and can then continue through the south or can go north to Chicago. This UP southern line is referred to as the Sunset Route.

From the Port of Oakland, BNSF trains typically route through the San Joaquin Valley to Barstow, and then to Needles, and then onto the Transcon. UP trains typically use the route from the Port of Oakland east towards UP Roseville and east through Nevada and ultimately east to Chicago. UP, also to a lesser extent than BNSF, uses the San Joaquin Valley route towards Southern California.

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3. *Interstate Line Haul Locomotive Operational Duty Cycles*

The operational duty cycles of newer high horsepower interstate line haul locomotives are dominated by higher power (notch) settings (i.e., Notch 5-8) when traveling cross country on main rail lines. When interstate line haul locomotives do operate within railyards (e.g., to trim with railcars to form trains or receive fuel, service, or maintenance) they typically operate in idle or lower power settings, which is about 40 percent of their total operational time. As a comparison, the effects of line haul locomotive power settings on diesel fuel consumption are significant. In idle or power setting Notch 1 a line haul locomotive may consume about 5 to 10 gallons per hour, whereas in Notch 8 a line haul locomotive may consume up to 200 gallons per hour.

A typical interstate line haul locomotive may consume 250,000 to ~~300,000~~⁴ gallons or more of diesel fuel annually. However, interstate line haul locomotives might spend only about 15 percent (e.g., 600 miles round trip – Needles to the Ports of Los Angeles/Long Beach and back) of a cross-country 4,200 mile round trip operating in California. Under the latter assumption, interstate line haul locomotives would consume about 50,000 to 75,000 gallons of diesel fuel annually within the state.

4. *Interstate Line Haul Locomotives: Statewide and Railyard Emissions*

The ARB emission inventory estimates that interstate line haul locomotives (e.g., Los Angeles to Chicago) contribute about 90 percent of the statewide locomotive NOx and PM emissions. Interstate line haul locomotives emissions do not concentrate their operations in specific local or regional areas like many switchers and medium horsepower locomotives. Instead, interstate line haul locomotive operations are distributed over many areas of the state.

Between 2015 and 2020, California should have nearly a statewide Tier 2 locomotive fleet average, largely due to the 1998 Locomotive NOx Fleet Average Agreement in the South Coast Air Basin (required by January 1, 2010) and normal locomotive fleet turnover in UP and BNSF national fleets that would benefit the rest of the state. Under this latter assumption, the primary difference in interstate line haul locomotive emissions would be the difference between Tier 2 and Tier 4 new interstate line haul locomotives. That difference would be about a 76 and 85 percent reduction in NOx and PM emissions, respectively, between Tier 2 and Tier 4 interstate line haul locomotives.

4. *Analysis of Option 9 – Accelerated Replacement of Line Haul Locomotives*

Based on prior experience, it may take more than 30 years for national fleets to turnover (or from 2015 to 2045) to the new Tier 4 interstate line haul locomotives and to be able to fully realize the Tier 4 emission benefits. This option would suggest the possibility of accelerating the introduction of new Tier 4 interstate line haul locomotives into California based on a similar approach employed with the 1998 Locomotive NOx Fleet Average

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Agreement for the South Coast Air Basin. The latter took about 12 years to fully implement.

If the options to replace switchers and repower and replace MHP locomotives were fully implemented, there would be no other California locomotives to over control and provide the flexibility for a California Tier 4 interstate line haul locomotive fleet average. Hence, this option would simply accelerate the number of Tier 4 interstate line haul locomotives directed by UP and BNSF to operate in California, without any averaging elements. ?

Technical Feasibility

GE and EMD are currently on schedule to commercially produce new Tier 4 interstate line haul locomotives by 2015. Prototypes of Tier 4 interstate line haul locomotives should be built by about 2013, which would allow two years for field testing prior to commercial production.

Note that U.S. EPA included compliance flexibility provisions as an option for locomotive manufacturers in complying with the Tier 4 emission standards. One option allows locomotive manufacturers to meet a 2.6 g/bhphr NOx standard in-use for three model years (i.e., 2015/2016/2017). The other option allows locomotive manufacturers to meet a 1.9 g/bhphr NOx standard in-use for seven model years (i.e., 2015-2022). GE and EMD may not seek the compliance flexibility. However, if GE and EMD do seek the compliance flexibility, it could reduce the actual emissions reductions provided by early models of Tier 4 locomotives over the operational life of the Tier 4 locomotive.

Potential Emissions Reductions

The ARB emission inventory estimates that 600 interstate line haul locomotives will operate in California on any given day by 2020. We have assumed only the emissions differences between Tier 2 and Tier 4 locomotives in California by 2020. With these assumptions, a statewide Tier 4 interstate line haul locomotive fleet of 600 could provide up to 16 tons per day of NOx and 0.6 tons per day of PM emission reductions, respectively.

Costs

Interstate line haul locomotives are manufactured either by General Electric (GE) or Electro-Motive Diesel (EMD). Currently, new Tier 2 locomotives can cost from \$1.8 million to \$2.2 million, depending on accessories and options. With new Tier 4 line haul locomotives, DPF and SCR aftertreatment may increase new locomotive capital costs by up to \$500,000. As a result, a new Tier 4 interstate line haul locomotive, with advanced engine design and upgrades, may cost between \$2.5 to \$3.0 million with GE and EMD commercial production of Tier 4 locomotives in 2015. Staff has assumed the upper end capital costs of \$3.0 million per Tier 4 line haul locomotive.

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A UP and BNSF Tier 4 fleet available to operate in California would require at least 600 Tier 4 interstate line haul locomotives operating in California on any given day by 2020. At up to \$3 million per Tier 4 interstate line haul locomotive, UP and BNSF would need to spend about \$1.8 billion for a 600 Tier 4 locomotive fleet dedicated to California only. UP and BNSF might need an additional 600 Tier 4 interstate line haul locomotives to maintain necessary operational flexibility and ensure adequate margins for locomotive service to California, which could cost up to an additional \$1.8 billion.

Staff has assumed UP and BNSF would need an additional 300 Tier 4 interstate line haul locomotives which would bring the total up to 1,500 new Tier 4 interstate line haul locomotives. UP and BNSF argue, however, that up to a national pool of 3,000 UP and BNSF Tier 4 interstate line haul locomotives would be needed to ensure 600 of them were operating in California on any given day. Staff disagrees with UP and BNSF's estimates based on our experiences with the railroads compliance with the Tier 2 fleet average. As a result, staff has assumed UP and BNSF needing 1,500 Tier 4 locomotives in a national UP and BNSF pool. See Table II-21 for an illustration.

**Table II-21
Estimated Number of UP and BNSF National Fleet Tier 4 Locomotives Needed to Ensure 600 in California on Any Given Day**

UP Tier 4 Locomotives	BNSF Tier 4 Locomotives	Total UP and BNSF Tier 4 Locomotives	California (Number On Any Given Day) Tier 4 Locomotives
900	600	1,500	600

A national pool of 1,500 UP and BNSF Tier 4 interstate line haul locomotives directed to operate towards California would cost an estimated \$4.5 billion. It should be noted, that as the interstate line haul locomotives move from primarily Chicago to California, a number of other states would be receiving the Tier 4 emission reductions benefits, too. Therefore, a case could be made that potential costs should be shared proportionally over the other states enroute to California in the UP and BNSF operating systems.

- Unless those States are willing to wait for "Nature to take its course" on the Tier 4 fleet turnover.

Cost-Effectiveness

By 2015, staff estimates UP and BNSF may pay up to \$3.0 million for each new Tier 4 interstate line haul locomotive. The cost-effectiveness of a Tier 4 interstate line haul locomotives, consuming 500,000 gallons per year, would be within a range \$3-\$8 per pound NOx and PM reduced nationally. Assuming operations of only 20 percent within California, and consuming 100,000 gallon per year in California, the cost-effectiveness might range between \$12 and \$37 per pound or more of NOx and PM reduced within the state.

*too high
- even 400,000 gallons
is on the high
side.*

*but it is going to happen
anyway, in time.*

*How to put a cost
effectiveness on an
"accelerated" plan??*

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Rail Mounted Gantry or Wide Span Gantry Cranes:

Wide span gantry (WSG) cranes travel on rails to lift and stack container cargo. Compared to RTG cranes, WSG cranes are wider, are driven by electrical power, and have a higher traveling speed while handling cargo. WSG cranes are not only larger but also faster than RTG cranes which allows them to process more container cargo faster and gives container handling facilities (like intermodal railyards) higher stacking densities and greater lift capacities. As WSG cranes are driven by electrical power, they are quieter than RTG cranes and also have no direct on-site emissions.

Wide Span Gantry (WSG) Cranes



U.S. EPA Tier 4 Non-Road Engine Regulation and the ARB Regulation for Mobile Cargo Handling Equipment at Ports and Intermodal Railyards

In 2004, the U.S. EPA promulgated final emission standards for Tier 4 off-road diesel engines which are estimated to result in a 95 percent reduction in particulate matter emissions (PM) and a 90 percent reduction in oxides of nitrogen (NOx). The rulemaking affects engines manufactured after 2007 and uses a seven year phase-in period to implement the new emission standards. The new U.S. EPA emission standards are based on the use of advanced exhaust emission control devices such as diesel oxidation catalysts (DOC), selective catalytic reduction (SCR), and diesel particulate filters (DPF).

In 2005, the ARB took aggressive steps to mitigate emissions beyond the U.S. EPA ^{non-}off-road diesel emissions standards by approving a regulation for "Mobile Cargo Handling Equipment at Port and Intermodal Railyards." This regulation takes a two pronged approach to reduce emissions and breaks up cargo handling equipment into two basic categories: Yard Trucks (e.g., hostlers) and Non-Yard Trucks (e.g., cranes). Both categories are required to comply with the regulation through the best available control technology (BACT).

PRELIMINARY DRAFT

Table III-3: Potential Options to Reduce Emissions from Cargo Handling Equipment

No.	Options	PM (tons per day)	NOx (tons per day)	Cost-Effectiveness (NOx+PM)	Costs (millions)
Yard Trucks/Hostlers – (Replace 322 yard trucks in 8 intermodal railyards)					
10	LNG Yard Trucks	-	-	-	\$39 (\$.12/unit 322 units)
11	Electric Yard Trucks	0.01 ¹ (2015)	0.27 ¹ (2015)	\$41/lb (2015) (8 years)	\$68 (\$.21/unit 322 units)
12	Hybrid Yard Trucks	-	-	-	-
RTG Cranes – (Retrofit/Replace 67 RTGs in 8 intermodal railyards)					
13	Energy Storage Systems	0.0014 (2015)	0.082 (2015)	\$9-\$18/lb (2015) (20 years)	\$11-22 (\$.16-\$.32/ 67 RTG Cranes)
14	Wide Span Gantry Cranes and Non- Locomotive Railyard Electrification	0.023 (2015)	0.79 (2015)	\$101/lb (2015) (20 years)	\$1,200 (134 WSGs replace 67 RTGs)
Idle Reduction Devices - (Retrofit cargo handling equipment with idle reduction devices similar to those employed on trucks and locomotives)					
15	Idle Reduction (Cargo Handling Equipment)	-	-	-	-

1. Emission reductions are surplus to the ARB Regulation for Mobile Cargo Handling Equipment at Ports and Intermodal Railyards in 2015.

Each option could provide further and earlier emission reductions than required by the ARB's existing cargo handling equipment regulation.

3. Analysis of Option 10 - LNG Yard Trucks at Railyards

Background

Alternative fuels are one of the many strategies that the ARB has employed to control emissions and reduce health risks from diesel engines. In heavy-duty diesel engines, liquefied natural gas (LNG) is one alternative to diesel fuel. LNG is a cryogenic liquid (boiling point: -260°F) and a form of natural gas that is not only denser, but also contains more energy per volume than most alternative fuels. However, compared with diesel fuel, the energy content of LNG is less (diesel is rated at about 130,000 Btu per gallon and LNG is rated at about 75,000 Btu per gallon). This a key consideration with LNG because LNG fueled vehicles can incur up to a 40 percent loss in energy content, as well as a potential loss in fuel efficiency, as compared to diesel on a gallon equivalent basis.

In order to transport and store LNG, with such a low boiling point, on-board fuel tanks require a double wall design with high grade insulation and vacuum inter-tank space. These requirements make LNG tanks more complex and heavier than traditional diesel

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fuel tanks. Accordingly, LNG fueled yard trucks carry a weight penalty ~~absent in~~ conventional diesel-fueled yard trucks.

compared to 1

Heavy-duty engines can either be originally manufactured to run on LNG or converted from diesel. Diesel engines can be converted to run on LNG fuel because they share many of the same components as heavy-duty LNG engines. The biggest differences between LNG and diesel engines are the compression ratio, fuel delivery, and ignition systems.

OEM purpose-built LNG-fueled engines, plus

There are several conversion kits available which allow heavy duty diesel engines to be adapted to use LNG fuel, but the conversion usually comes with a tradeoff of derated power which avoids pre-ignition detonation of the gaseous fuel.

Technical Feasibility

LNG yard trucks are being evaluated through demonstration programs sponsored by the U.S. EPA, South Coast Air Quality Management District (SCAQMD), the Ports of Los Angeles and Long Beach, and others. In 2008, Sound Energy Solutions (SES) and the Port of Long Beach released a report detailing the findings of a joint project to determine performance, emissions, and business impacts of LNG yard trucks.

One potential issue surrounding the use of LNG fuel is the NOx emissions from LNG engines. Previous studies comparing on-road diesel to on-road LNG yard trucks, one conducted by ARB (2006) and one by the Port of Long Beach (2007), showed significantly higher NOx emissions from the LNG engines in comparison to the on-road diesel engines³. Emission testing conducted as part of the Port of Long Beach and SES LNG yard truck study also found that the LNG engines produced more NOx than the on-road diesel engines. The SES report also noted a decrease in fuel efficiency in comparison to the diesel-fueled yard trucks. ARB plans to conduct in-use emissions testing in 2009, comparing a diesel-fueled yard truck certified to 2007 on-road standards to an LNG-fueled yard truck certified to 2010 on-road standards.

How much higher NOx? If every thing is not just right on the LNG engine, the NOx emissions can be huge.

What did our friends at SCAQMD have to say about these results?

The lack of an LNG fueling infrastructure also remains a challenge to LNG. In the SES study, the refueling station consisted of a 3,450 gallon ORCA™ mobile LNG refueling truck. The truck was inspected to verify conformance to local permitting and safety requirements and, for the study, treated as a permanent structure. Applied LNG Technologies was contracted to provide fuel deliveries for the project.

Potential Emission Reductions

The SES report compared three LNG-fueled yard trucks to a representative sample of diesel-fueled yard trucks powered by off-road and on-road engines meeting standards illustrated in Table III-1. The report showed that _____

Are you going to include a summary of the results?

³ Source: "Cargo Handling Equipment Yard Truck Emissions Testing", CARB, September 2006; "Liquefied Natural Gas (LNG) Yard Hostler Demonstration and Commercialization Project – Prepared for the Port of Long Beach," West Start-CALSTART, 2007

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One key aspect to the ARB CHE Regulation is its fuel neutrality. New yard trucks must meet the 2007+ on-road or Tier 4 off-road engine standards for PM and NOx regardless of fuel type. Therefore, if LNG fueled yard trucks are compared to diesel fueled yard trucks powered by 2007+ on-road or Tier 4 off-road engines, they provide no surplus emission reductions to the ARB CHE regulation in 2015.

Costs

According to 2008 SES and the Port of Long Beach report, the estimated cost of an LNG yard truck is about \$120,000 per unit. The SES report also estimated that the cost of a LNG fueling station at around \$700,000, but ARB staff did not include the fueling infrastructure costs as it was not clear how many LNG trucks could be supported by an individual LNG fueling station. In comparison, diesel fueled yard trucks are estimated to cost between \$50,000 and \$60,000 per unit.

Cost-Effectiveness

come on - call it as you see it. Include a "negative cost effectiveness" in the report!

Cost-effectiveness for LNG yard trucks was not calculated because staff was not able to identify emission reductions that are surplus to the ARB CHE regulation in 2015.

4. Analysis of Option 11 - Electric Yard Trucks in Railyards

Background

Electric yard trucks use onboard batteries which produce electricity to run an electric motor. Electric yard trucks have zero emissions onsite, but need an external charging station to recharge their batteries. This technology has been demonstrated on vehicle platforms ranging from passenger vehicles to trucks. Electric yard trucks are currently being tested at the Port of Los Angeles to demonstrate the technical feasibility of this technology in port applications.

Technical Feasibility

Electric yard trucks are being evaluated through demonstration programs sponsored by the U.S. EPA, SCAQMD, the Ports of Los Angeles and Long Beach, and others. In 2008 the Port of Los Angeles began testing and demonstrating an electric yard truck for several parameters critical to port applications, including payload and range. As a result of this demonstration effort, the Los Angeles Harbor Commission recently approved an order for the production of 20 electric yard trucks, pending the successful completion of cargo terminal tests. According to the manufacturer, Balqon, these electric yard trucks are capable of towing up to 30 tons, have a maximum speed of 25 miles per hours, and a range of 30 miles when under full load.

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Potential Emission Reductions

ARB staff compared the individual emissions of an electric yard truck to a conventional yard truck powered by a 2007+ on-road diesel engine (PM: 0.01 g/bhp-hr, NOx: 0.3 g/bhp-hr). ARB staff estimated that on a per unit basis, electric yard trucks provide potential diesel PM and NOx emission reductions of 0.000005 and 0.00016 tons per day, respectively.

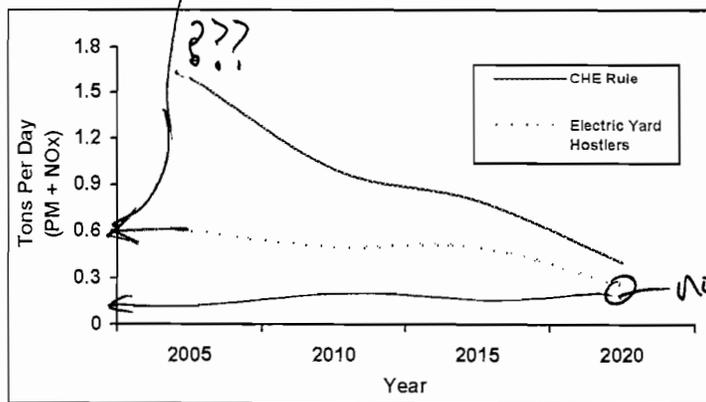
0 for electric? or is there some emission factor for electricity that everyone agrees to?

2.0 for 2007
.2 for 2010, right?

According to the 18 railyard HRAs, in 2005, the 322 yard trucks operated at eight intermodal railyards generated an estimated 0.041 and 0.90 tons per day of diesel PM and NOx emissions, respectively. As a result of the ARB CHE regulation, staff estimates that by 2020 diesel PM and NOx emissions, associated with yard trucks, could be as low as 0.005 and 0.082 tons per day respectively.

Staff estimates that electric yard trucks could reduce railyard diesel PM and NOx emissions from yard trucks by up to 100 percent. These emission reductions would be surplus to the to the ARB CHE regulation, as well as the U.S. EPA/ARB Tier 4 non-road engine regulation and result in diesel PM and NOx reductions of up to 0.015 and 0.46 tons per day, in 2010, respectively. In 2015, as diesel engines become cleaner, the level of diesel PM and NOx reductions that electric yard trucks could achieve drops to 0.01 and 0.27 tons per day, respectively. Figure III-1 shows the projected railyard CHE emission reductions from electric yard trucks.

Figure III-1: CHE Railyard Emissions – Projected Emission Benefits of Electric Yard Trucks



This graph needs more explanation on the assumptions used.

Costs

According the Port of Los Angeles Electric Truck Demonstration Fact Sheet, electric yard trucks cost approximately \$189,950 per unit. The fact sheet also states that the price of one charging station (which simultaneously charges four trucks) is about \$75,000. It is not clear whether the charging station cost also includes the cost of construction or additional infrastructure needed to support this technology. Allocating

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the cost of the charging station to an electric yard truck increases the cost to about \$209,000 per piece of equipment. In comparison, diesel fueled yard trucks are estimated to cost between \$50,000 and \$60,000 per unit.

2010 on-highway compliant?

Cost-Effectiveness

Staff has calculated cost-effectiveness for electric yard trucks to be about \$41 per pound of NOx and PM emissions reduced. This is based on the estimated railyard yard truck emission levels of diesel PM and NOx in 2015, as a result of the ARB cargo handling regulation. As stated previously, this estimate does not account for the cost of the electric infrastructure.

5. Analysis of Option 12 - Hybrid Yard Trucks in Railyards

Background

Hydraulic hybrid yard trucks are vehicles that, in addition to their main engines, have a drive train that can recover, store, and reuse energy. In a hydraulic hybrid, the hydraulic drive system uses hydraulic accumulators and converts stored energy with hydraulic pump motors. This hydraulic drive system replaces a conventional drive train and eliminates the need for a conventional transmission.

The hydraulic hybrid system increases vehicle fuel economy in three ways by: 1) permitting the recovery of energy that is otherwise wasted in vehicle braking, 2) allowing the engine to be operated at much more efficient modes, and 3) enabling the engine to be shut-off during many operating conditions, such as when the vehicle is decelerating and momentarily stopped.

Technical Feasibility

Hybrid yard trucks are being evaluated through demonstration programs sponsored by the U.S. EPA, the Ports of Los Angeles and Long Beach, and others. In 2005, the U.S. EPA and United Parcel Service (UPS) unveiled a demonstration delivery van with a hydraulic hybrid drive-train. The demonstration van uses a series hydraulic hybrid system which transmits power directly to the wheels rather than through a conventional transmission or drive shaft. Early test results show a potential for up to a 45 to 50 percent improvement in fuel economy in city driving.

Based on the results of the early tests, U.S. EPA and the Port of Long Beach commenced a hydraulic hybrid yard truck demonstration project. The goal of this demonstration program is to build a prototype so that common requirements could be established for a hybrid yard truck duty cycle. The results of this demonstration are still pending. ARB is planning to support this demonstration project through in-use comparison emissions testing with a 2007+ conventional diesel yard truck. Testing is expected to occur in 2009.

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Potential Emission Reductions

Staff was unable to develop estimates of hybrid yard trucks potential emission reductions. Any emission reductions would most likely result from increases in fuel economy indicated throughout initial testing. During ARB's planned emissions testing next year, in-use data logging will be performed on the hybrid engine and an appropriate duty cycle will be developed and used for the comparison tests.

Costs

Staff does not currently have cost information for hybrid yard trucks. However, following the UPS demonstration, U.S. EPA estimated that in high-volume production (20,000 to 30,000 units per year), the incremental cost difference would be about \$10,000 compared to a conventional diesel truck for the same application.

Cost-Effectiveness

Staff did not calculate cost-effectiveness for hybrid yard trucks due to the lack of costs and emissions reductions data.

6. Analysis of Option 13 - Energy Storage Systems on Railyard RTG Cranes

Background

Energy Storage Systems (ESS) capture ~~regenerated~~ ^{normally} energy from energy that would otherwise be dissipated and lost from crane braking, deceleration, etc. In crane applications, an ESS is integrated with a hoist motor, and the dissipated (lost) energy is captured (regenerated) from the hoist cycle. As the crane lowers a container, the hoist motor acts as a generator (through regenerative braking energy, a result of deceleration). Typically, this energy is routed to dissipating resistor banks and wasted as heat. The ESS captures this energy and uses it to reduce the load of an engine throughout the duty cycle.

Technical Feasibility

ESS systems are currently available for several off-road engines. These systems are considered a Level 1 VDECS for RTG crane applications. A level 1 VDECS reduces diesel PM by up to 25 percent, however, ESS can also reduce NOx emissions by 25 percent as well⁴.

Potential Emission Reductions

ARB staff calculated the emission benefits of an ESS retrofit on a RTG crane powered by a Tier 4 off-road diesel engine (PM: 0.01 g/bhp-hr, NOx: 0.3 g/bhp-hr). ARB staff

⁴ <http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm>

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Cost-Effectiveness

Cost-effectiveness for ESS ranges between an estimated \$9 and \$18 per pound of NOx and PM emissions reduced. Cost effectiveness is based primarily upon the estimated cost range for ESS, and the estimated railyard RTG crane emission levels of diesel PM and NOx in 2015, as a result of the ARB cargo handling regulation.

7. Analysis of Option 14 – Use of Railyard Wide Span Gantry Cranes and Non-Locomotive Railyard Electrification

Background

One alternative to traditional RTG cranes are wide span gantry (WSG) cranes and installation of the necessary electric infrastructure to support WSG cranes. Railyard electrification and the installation of WSG cranes could nearly eliminate all RTG crane and yard truck railyard-related emissions.

WSG cranes are powered by electricity generated by the electrical grid (rather than a diesel engine). WSG cranes are twice as wide as conventional RTG cranes and are rail mounted. In contrast to RTG cranes, WSG cranes can be semi-automated because they employ advanced computer and GPS systems.

? distributed (generated in Nevada & Arizona!)

Technical Feasibility

Generally, WSG crane systems are implemented at ~~new~~ new or key port and railyard facilities designed to handle a large volume of containers (i.e., more than 750,000 per year). BNSF has installed WSG cranes at the BNSF Seattle International Gateway facility located at the Port of Seattle. BNSF has also proposed installing WSG cranes at other key intermodal facilities in Memphis and Kansas City.

Union Pacific has proposed to modernize the Intermodal Container Facility (ICTF) in Long Beach, California. UP has proposed to install 39 WSG cranes in three phases over three years. The proposed expansion would replace 10 existing RTGs, with 20 WSG cranes. In addition, UP has proposed to install an additional 19 WSG cranes to accommodate the proposed doubling of container handling, which would increase from the current 750,000 to 1,500,000 lifts.

Installation of WSG cranes carry widely varying costs associated with planning and construction and the operational needs of an individual facility. There is no one route to electrification at a railyard. Every facility is different, and projects of this magnitude require extensive planning. The type of electric equipment which may be operationally feasible at one yard may not be operationally feasible at another railyard. Furthermore, electrification may not necessarily result in zero emissions. Some facilities may still need to use diesel-fueled CHE, such as side loaders, top picks, and forklifts, to complement the all-electric equipment.

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Automatic shutdown/startup systems (referred to as AESS) for locomotives work by managing the shutdown and restart sequences of a locomotive engine while the locomotive is stopped. The system monitors the existing condition of several essential criteria (i.e. brake cylinder pressure, battery voltage, throttle position, etc.) against preset standards and determines whether the engine can be shut down or if it needs to be restarted. In trucks, the AESS system works in a similar fashion.

Auxiliary power units (APU) are small ^{diesel} engines that work to reduce engine idle by shutting down the main (larger) engines of locomotives and trucks. As with automatic shutdown/startup systems, these units also monitor essential engine systems against set criteria. APUs, however, can also provide power for the heating and air conditioning units in the locomotive or truck cab.

Fuel operated heaters (FOH) and battery air conditioning (BAC) both work to reduce engine idle by providing power to a cab's heating and air conditioning system, allowing the main engine to be shut-down.

Most ~~idle~~ ^{are currently} reduction technologies ~~were~~ ^{not initially} designed for cargo handling equipment. While shutdown/startup systems have been effective at reducing emissions from idling trucks and locomotives, it is not clear what, if any, emission reductions these systems can provide from cargo handling equipment.

Anti-idling policies at intermodal railyards may also effectively reduce emissions from CHE. Limiting unnecessary idling will result in reduced fuel usage, a reduction of criteria pollutants, and a fuel cost savings.

Technical Feasibility

Idle reduction device technology for cargo handling equipment is not currently available nor is it being demonstrated. Additionally, there is currently no regulation prohibiting unnecessary idling from CHE. It has not yet been determined to what extent CHE may idle unnecessarily. Further research is needed to address CHE adaptability with idle reduction devices, to identify potential opportunities for emission reductions (i.e., extended idling periods within the duty cycle), and analyze railyard cost-effectiveness and operational and business technical feasibility. Safety issues related to turning engines off while equipment is awaiting use also needs to be thoroughly studied.

Potential Emission Reductions

At this time there is no proven idle reduction technology for cargo handling equipment. However, the emission reductions achieved would depend on the amount of unnecessary idling that exists and is reduced. Any emission reductions would be surplus to the ARB CHE regulation.

PRELIMINARY DRAFT

Costs

At this time staff does not have any actual costs for idle reduction devices on CHE.

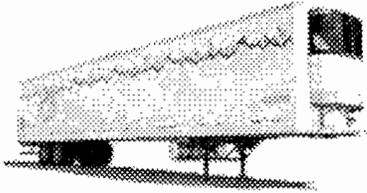
Cost-Effectiveness

ARB staff does not currently have actual emission reductions and costs data for idle reduction devices on CHE. As a result, staff has not calculated cost-effectiveness.

B. Transportation Refrigeration Unit (TRU) – Plug-In Electrification

1. Background

TRUs are typically powered by small nonroad diesel engines of usually less than 50 horsepower. TRU diesel engines power compressors that regulate the temperature inside a cargo container or refrigerated railcar. They are primarily used to ensure that temperature sensitive cargo, such as food, is kept at an acceptably low temperature while in transit.



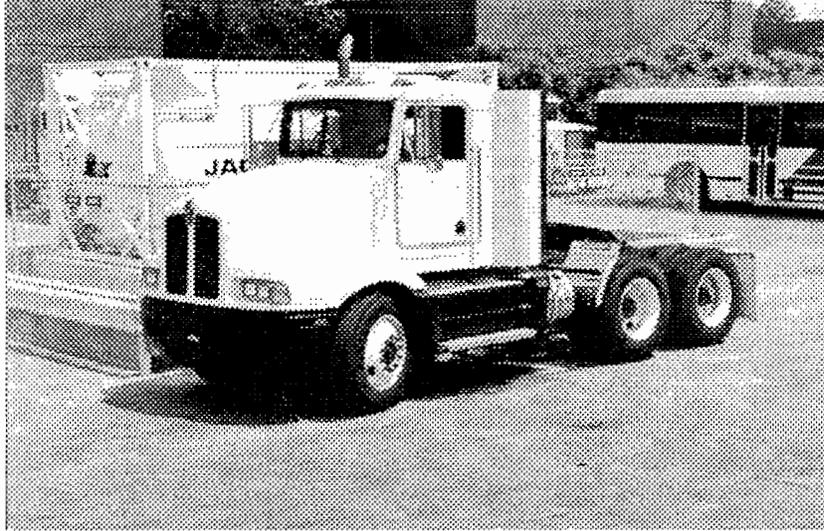
In February 2004, the Board approved a regulation for “In-Use Diesel Fueled Transport Refrigeration Units” (TRU) and TRU generator (gen) sets, and facilities where TRUs operate. The existing TRU regulation was approved by the Office of Administrative Law on December 10, 2004. Implementation begins December 31, 2008 and is phased-in over about 15 years. Note, however, that the U.S. EPA has not yet granted a waiver for this regulation. As a result, the ARB staff has issued guidance that indicates that the regulation will be enforced six months after issuance of the waiver. The goal of the TRU regulation is to reduce diesel particulate matter from TRUs that operate in California by about 92 percent by 2020.

In 2005, the ARB emission inventory estimated that statewide TRUs accounted for about 2.5 tons per day (or 913 tons per year) of diesel PM and 24 tons per day of NOx. According to the ARB railyard HRAs, TRU diesel PM emissions were an estimated 0.04 tons per day, or about 14 tons per year, within California’s 18 designated railyards in 2005. Within the eight intermodal railyards, TRUs accounted for about 13 tons per year in 2005. Total railyard TRU diesel PM emissions represent nearly 2 percent of statewide TRU diesel PM emissions.

Staff has prepared a technical assessment of an option that would be in addition to the ARB TRU regulation. This option is to include plug-in electrification for TRUs, to further reduce diesel PM emissions from TRUs at railyards.

PRELIMINARY DRAFT

Figure III-3. LNG Drayage Truck by Kenworth Truck Company



Potential Emission Reductions

In 2005, within the eight intermodal railyards boundaries (with railyard HRAs), heavy-duty (HD) diesel trucks were responsible for an estimated 31 tons per year of diesel PM emissions. The ARB has three statewide diesel truck regulations for new, drayage, and private fleet trucks. However, the ARB drayage truck regulation will have the largest impacts in the near-term at intermodal railyards. ARB staff estimates that the ARB port and intermodal railyard drayage truck regulation will reduce diesel PM emissions by up to 90 percent by 2015, or to about 3.1 tons per year. New LNG heavy duty (HD) trucks could potentially provide earlier and greater emissions reductions beyond the emissions reductions provided by the ARB drayage truck regulation in 2015.

The Ports of Los Angeles and Long Beach have about 16,800 drayage trucks operating at their facilities. On average, the port's drayage trucks are 1995 model year trucks emitting at about 5.0 g/bhp-hr NO_x and 0.1 g/bhp-hr PM. However, under the ARB drayage truck regulation, the older diesel trucks will be replaced or required to meet the 2007 new truck PM emissions standard of 0.01 g/bhp-hr (90% reduction) by January 1, 2010, and the 2007 new truck NO_x emissions standard of 1.2 g/bhp-hr (75% reduction) by January 1, 2014. See the applicable truck emission standards below in Table III-7. With an average 90 percent reduction, the eight intermodal railyards diesel drayage truck diesel PM emissions could be reduced from 31 to about 3.1 tons per year by 2020.

As a result, the new 2007 HD diesel trucks, required by the ARB drayage truck regulation by 2010 and 2014, provide about the same level of PM and nearly the same levels of NO_x emissions reductions as LNG HD trucks. With a reasonable compliance margin below the NO_x standard, new 2007 HD diesel trucks may provide about equivalent NO_x emissions reductions as current LNG HD trucks. However, staff has assumed that LNG HD trucks will provide a NO_x benefit of about 33 percent.

Not if they are pre-concent decree! much higher

PRELIMINARY DRAFT

Table III - 7
 HD Diesel Truck and LNG Truck
 NOx and PM Emissions Standards

likely a low estimate.

HD Diesel and LNG Truck Model-Year	NOx (g/bhp-hr)	PM (g/bhp-hr)	NOx Reduced 1995 MY	PM Reduced 1995 MY
1995 Trucks	5.0	0.1	-	-
New 2007 Trucks	1.2 **	0.01	76%	90%
New 2010 Trucks	0.2	0.01	96%	90%
ARB Drayage Truck Regulation (2010 PM/2014 NOx)	1.2	0.01	76%	90%
LNG	0.8*	0.01*	84%	90%

* LNG certified emission rates.

** Diesel in-use and actual NOx emissions may be equivalent to LNG.

The Port of Los Angeles (white paper) assumed that the average port drayage truck is a 1995 model year. The ARB Goods Movement Calculation assumes 1995 model year port drayage trucks travel about 40,000 miles per year. A 1995 model year HD diesel truck has NOx and PM grams per mile emissions rates of about 21 and 0.7, respectively, or about 1 ton per year for both NOx and PM.

ARB staff has assumed a new 2007 HD diesel truck NOx and PM emissions levels (i.e., 5 grams/mile NOx and 0.07 grams/ mile PM) as the baseline for 2014, based on the ARB drayage truck regulation. A new 2007 HD diesel truck would generate about 446 pounds of NOx (440 lbs) and PM (6 lbs) per year.

An LNG HD replacement would provide emissions reductions, beyond those required by the ARB drayage truck regulation by 2015, for NOx only at about 33 percent. A 33 percent NOx reduction would provide about 146 pounds per year of NOx emissions reductions, beyond the current ARB drayage truck regulation by 2015.

Costs

The Port of Los Angeles (white paper) estimated the cost of a new LNG HD drayage truck to be about \$210,000. A new 2007/2010 HD truck was estimated to cost about \$110,000. The estimated additional cost for a new HD diesel truck to be built with a LNG fuel system (Cummins Westport, 2007) is estimated to be about \$80,000.

The Port of Los Angeles estimated the cost for new LNG fueling tanks to be \$5 million each. ARB staff has estimated that capital costs for a LNG fuel dispensing station are an estimated \$800,000. Staff was advised that approximately 4 stations are needed to fuel 1,000 trucks, which is equivalent to a cost of \$3,200,000 per 1,000 trucks, or about \$3,200 per truck. ARB staff chose not to include LNG fueling infrastructure costs for this analysis.

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Cost-Effectiveness

With capital costs of about \$210,000, and assuming a 15-year useful life, the LNG HD truck replacement cost-effectiveness would be about \$96 per pound of NO_x reduced. Assuming only the cost difference between a new HD diesel drayage and LNG HD truck of about \$100,000 (i.e., \$210,000-\$110,000), the cost-effectiveness would lower to about \$46 per pound of NO_x reduced.

4. Analysis of Option 19 – Compressed Natural Gas (CNG) Fueled Drayage Trucks Within Intermodal Railyards

Background

CNG trucks are powered by compressed natural gas. To provide adequate driving range, CNG must be stored onboard a vehicle in tanks at high pressure—up to 3,600 – 4,000 psi (pounds per square inch). A CNG-powered vehicle gets about the same fuel economy as a conventional gasoline vehicle on a gasoline gallon equivalent (GGE) basis.

Unlike diesel-powered trucks, CNG trucks have a shorter driving range due to fuel storage limitations. This option examines replacing the current average drayage truck fleet (1995 model year fleet) with new CNG fueled drayage trucks that will operate primarily from the ports to near dock intermodal railyards.

This option would have the greatest potential impacts at near dock railyards, such as UP ICTF, proposed BNSF SCIG, UP Oakland, and BNSF Oakland International Gateway (OIG). CNG trucks may also have potential range to operate to regional inland areas – such as the Inland Empire.

Technical Feasibility

The ports of Los Angeles-Long Beach recently launched a 12-month demonstration of CNG-fueled drayage trucks in December 2008 (see Figure III-4). The CNG HD drayage trucks are certified at 0.1 g/bhp-hr for NO_x, which meets and exceeds the stringent 2010 NO_x on-road truck emission standards of 0.2 g/bhp-hr. However, it is possible with a reasonable compliance margin, new 2010 HD diesel trucks may have actual in-use NO_x emissions levels of about 0.1 g/bhp-hr similar to the CNG drayage trucks. The CNG drayage trucks also meet the new 2007-2010 on-onroad truck PM emissions standards of 0.01 g/bhp-hr.

Four heavy-duty CNG trucks (powered by Cummins Westport ISL G engines) were recently introduced at the Ports of Los Angeles and Long Beach to demonstrate CNG HD drayage trucks abilities to move containers between the San Pedro Bay ports and nearby freight-consolidation yards. CNG trucks would be expected to be commercially available if the technology is successful during the demonstration project.

Figure III-4

PRELIMINARY DRAFT

With an average 90 percent reduction, the eight intermodal railyards diesel drayage truck diesel PM emissions could be reduced from 31 to about 3.1 tons per year by 2020.

As a result, the new 2007 HD diesel trucks or equivalent, required by the ARB drayage truck regulation by 2010 and 2014, provide about the same level of PM emissions reductions as CNG HD trucks. With a reasonable compliance margin below the NOx standard, new 2010 HD diesel trucks may provide about equivalent NOx emissions reductions as current CNG HD trucks. However, staff has assumed that CNG HD trucks will provide a NOx benefit of about 90 percent, as compared to new 2007 HD diesel truck emissions standards, and which is required by the ARB drayage truck regulation by 2015.

Why not compare to 2010 trucks at 0.2 g/hp-hr NOx? We are only 1 year away!

**Table III - 8
HD Diesel Truck and CNG Truck
NOx and PM Emissions Standards**

HD Diesel and LNG Truck Model-Year	NOx (g/bhp-hr)	PM (g/bhp-hr)	NOx Reduced 1995 MY	PM Reduced 1995 MY
1995 Trucks	5.0	0.1	-	-
New 2007 Trucks	1.2	0.01	76%	90%
New 2010 Trucks	0.2 **	0.01	96%	90%
ARB Drayage Truck Regulation (2010 PM/2014 NOx)	1.2	0.01	76%	90%
CNG	0.1*	0.01*	98%	90%

* CNG certified emission rates.

** 2010 diesel in-use and actual NOx emissions may be equivalent to CNG.

The Port of Los Angeles (white paper) assumed that the average port drayage truck is a 1995 model year. The ARB Goods Movement Calculation assumes 1995 model year port drayage trucks travel about 40,000 miles per year. A 1995 model year HD diesel truck has NOx and PM grams per mile emissions rates of about 21 and 0.7, respectively, or about 1 ton per year for both NOx and PM.

ARB staff has assumed a new 2007 truck NOx and PM emissions levels (i.e., 5 grams/mile NOx and 0.07 grams/ mile PM) as the baseline for 2014, based on the ARB drayage truck regulation. This would amount to about 446 pounds of NOx (440 lbs) and PM (6 lbs) per year as required for diesel drayage trucks by 2015.

A CNG HD replacement would provide emissions reductions, beyond those required by the ARB drayage truck regulation by 2015, for NOx only at about 90 percent. A 90 percent NOx reduction would provide about 400 pounds per year of NOx emissions reductions beyond the current ARB drayage truck regulation by 2015.

PRELIMINARY DRAFT

Costs

The initial capital costs of a single ALECS unit, with an estimated 12 bonnet system, is about \$8.7 million. Annual operational costs for an ALECS unit is estimated to be about \$900,000. As a result, the total capital and operational costs of a single ALECS unit for a 20 year period is about \$25 million. These capital costs include the purchase cost, 20 years of operational and maintenance costs, and on average \$64,000 every five years for the catalyst replacement. (Source: TIAX Report)

Cost-Effectiveness

Preliminary cost-effectiveness data was developed in the TIAX Report, based on the experience with the ALECS pilot program in 2007. TIAX estimated ALECS would be in full operation 96 percent of the time, or 23 out of 24 hours per day. This may be an unrealistic expectation for use of ALECS in California's railyards. The railyards can and do operate up to 24 hours per day. However, most locomotive intermodal and classification railyard peak activities occur between 6 am and 6 pm. There are also numerous hours each day from 6 am to 6 pm, where there is significantly less activity occurring than during key peak periods.

TIAX included NO_x, HC, and PM in the cost-effectiveness calculation. Oxides of sulfur (SO_x) emissions reduced were not included in the cost-effectiveness calculation. TIAX also weighted the PM emissions reduced by a factor of 20, based on the Carl Moyer Incentive Program guidelines. This weighting was used in calculating cost-effectiveness because of the toxicity level of PM. According to TIAX, and based on the assumptions above, TIAX estimated the cost-effectiveness for ALECS to range between \$3.60 and \$9 per pound of weighted pollutant reduced. This range of cost-effectiveness was largely dependent on the mode of locomotive operations (i.e., power setting), a Tier 0 versus Tier 2 locomotive, and the 96 percent utilization rate. (TIAX April 2007)

did you do this for any other sub-studies in this report?

The UP Roseville Railyard ALECS full-scale demonstration project is scheduled to begin in early 2009. The west side of the UP Roseville Railyard maintenance facility was chosen as the area of the railyard to demonstrate ALECS. At this location in the railyard, the estimated diesel PM emissions are about 0.80 tons per year (See figure 1 and 2 in Appendix K).

In this cost-effectiveness calculation, staff assumed that the total emissions reductions for the west side of the maintenance facility area are about 21 tons per year (i.e., 1.0 and 20 - PM and NO_x tons per year, respectively). Based on these assumptions, staff estimates the ALECS cost-effectiveness is about \$30 per pound of PM and NO_x reduced for this scenario. Detailed calculations and scenarios are described in Appendix K.

- How do the cost effectiveness calculations take into account the changing, cleaner locomotive fleet in future years? Look to 2020, when a bunch of T4 locos are in the fleet. If the emissions into the hood are down 90%, then the cost-effectiveness in these later years starts to look a lot worse than it already does.

12/22/08

PRELIMINARY DRAFT

A final report to the legislature is being prepared by ARB staff, with the review of the Advisory Group, regarding the results of the test program.

2. Analysis of Option 22 – Remote Sensing Devices

Technical Feasibility

The technological feasibility for remote sensing devices is currently being evaluated by ARB staff and the Advisory Group.

Potential Emissions Reductions

At this time, there is insufficient data available to determine whether RSD readings could result in locomotive emissions reductions.

Costs

The estimated cost of one remote sensing device is about \$250,000. In addition, based on the AB 1222 experience, personnel are needed to operate and monitor the RSD devices. *and then another x,000 man-hours and a year to crunch the data!*

Cost-Effectiveness

At this time, there is insufficient data available to determine whether RSD readings could result in locomotive emissions reductions. Therefore, staff is currently unable to calculate cost-effectiveness for the use of RSD to read locomotive emissions.

C. Retrofit Interstate Locomotives with Idle Reduction Devices

1. Background

Intrastate Locomotives

Intrastate locomotives are defined by ARB regulation as operating 90 percent or more of the time in California, based on vehicle miles traveled, hours of operation, and fuel consumption. The 2005 ARB/Railroad Agreement requires that 99 percent of intrastate locomotives be retrofitted with idle reduction devices by June 30, 2008. Both UP and BNSF met the requirement by retrofitting more than 400 UP and BNSF intrastate switch and medium horsepower locomotives with idle reduce devices by June 30, 2008.

UP and BNSF intrastate locomotives, and all interstate line haul locomotives equipped or retrofitted with idle reduction devices, are programmed by UP and BNSF to limit non-essential idling to 15 minutes or less.

PRELIMINARY DRAFT

H₂ price per diesel equivalent gallon = \$ ___?

Costs

The BNSF demonstrator fuel cell locomotive capital cost is estimated to be about \$3.5 million. Hydrogen fueling infrastructure cost data are needed.

OK. But what about the cost of the hydrogen?
This info should be available from the California Hydrogen highway.

Cost-Effectiveness

Based on the BNSF fuel cell switch locomotive demonstration, staff estimates the cost-effectiveness range to be between \$4 and \$8 per pound of NOx and PM reduced, as compared to a pre-Tier 0 switch locomotive (17.4 g/bhphr-hr and 0.44 g/bhp-hr with about 20 tons per year of both NOx and PM), with a range of 10 to 20 years of useful life. The emissions differences may be limited to Tier 4 switch locomotives by 2020.

A Tier 4 switch locomotive would have NOx and PM emissions standards of 1.3 g/bhphr-hr and 0.03 g/bhp-hr with about 1.5 tons per year of both NOx and PM emissions. As a result, the cost-effectiveness would range between \$58 and \$117 per pound of NOx and PM reduced, with a range of 10 to 20 years for useful life. Also, fueling infrastructure cost data are needed.

↳ fuel price

4. Analysis of Option 25 – GE Hybrid Locomotive Use of Regenerative Braking

Background

both AC+DC locos have alternators, both rectify to DC. AC units then chop the dc to make AC again.

Virtually all American freight locomotives are hybrids. A large diesel engine turns a generator (DC Locomotive) or alternator (AC Locomotive) which creates electric current to power electric traction motors between the wheels. The diesel engine and generator/alternator or alternator combination is generally referred to as a diesel generator set. This configuration eliminates the need for a traditional transmission and enhances efficiency. A battery electric hybrid locomotive, like the Green Goat, is one hybrid approach which is discussed in much greater detail in Chapter II for locomotives.

In one hybrid approach, locomotives supplement their airbrakes with dynamic braking, or regenerative braking, by using the traction motors as generators. Normally, the current generated by dynamic braking is dissipated as heat through resistor grids at the top of the locomotive. General Electric (GE) has been conducting research to design a new hybrid locomotive to capture this otherwise wasted electrical energy.

power

GE's Evolution Series Hybrid is a new type of hybrid line haul locomotive. GE developed this locomotive concept to use the "dissipated" electric current from dynamic braking to charge a battery bank. This captured power can be used in three ways. "Dual Power Mode" allows the locomotive to use the stored energy in the batteries to supplement the diesel-electric engine. This allows the locomotive to conserve fuel by reducing the amount of output required from the diesel-electric engine. "Power boost Mode" allows for the batteries to be used in conjunction with the full 4,400 horsepower

PRELIMINARY DRAFT

of the diesel-electric engine. "Primary Power Mode" allows the power stored in the batteries as the primary source of power reducing emissions and fuel consumption.

- I wish they had an "idle reducing stand by" mode also, where they used stored power to keep the engine warm & ready to go, to reduce the # of AESS restarts.

Technical Feasibility

The GE Evolution Series hybrid is currently in a demonstration and field validation phase. The first demonstrator or prototype was available for public viewing during the Union Pacific/GE Technology Tour which occurred in California in 2007. Numerous challenges still remain with its development (e.g., battery technology, system hardening for rail service, protocols and procedures to handle high voltage batteries, process for recognizing emission benefits). GE anticipates that final product launch will occur sometime in 2010.

Potential Emission Reductions

A GE Hybrid locomotive is expected to have 5 to 10 percent improvement in fuel efficiency and emissions, depending on route topography and type of train service.

Costs

Cost data are needed for GE Evolution Series Hybrid interstate line haul locomotive.

Cost-Effectiveness

At this time, staff does not have actual emissions reductions and cost data to be able to calculate cost-effectiveness.

5. **Analysis of Option 26 – Ethanol-Fueled Locomotive**

Background

The project involves a completely new locomotive engine technology, developed by Alternative Hybrid Locomotive Technologies (AHL-TECH). This hybrid design locomotive combines internal combustion engines with battery technology. The engine is spark-ignited, fueled by bioethanol. The ethanol-hybrid stores electricity when the generator produces more power than is being used to move the locomotive. The operator therefore has the option of powering the axles by running the engine or drawing on the battery. This also allows for regenerative braking, i.e., capturing energy dissipated when the locomotive is brought to a halt.

The ethanol-hybrid locomotive could potentially replace smaller locomotives (up to 2,500 hp), such as switchers. AHL-TECH is also designing a line of 3,000 to 4,300 hp ethanol-electric hybrid locomotives for heavy haul, helper, and mainline freight service.

AHL-TECH has partnered with Power-Tec Engineering to provide design and development services for the ethanol generator sets.

locomotive

Gen-set type unit, with multiple smaller engines, right? "Power Modules" is what they call them.

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This technology approach would be the first locomotive with an ethanol-powered generator. Also, it would also be the first use of a higher-horsepower (> 500 hp) ethanol-optimized engine.

Technical Feasibility

← Contact them for the latest plan/schedule for a prototype.

The prototype ethanol-hybrid locomotive is currently under development.

Potential Emission Reductions

? what is a "prevention technology"?

By fueling with ethanol rather than diesel, the ethanol-hybrid system proposed by AHL-TECH offers a completely new prevention technology for smaller locomotives. AHL-TECH's ethanol-hybrid system, if successful, could be applied to switcher locomotives, which are a significant source of railyard PM and NO_x emissions in California.

In addition to reducing PM and NO_x, the AHL-TECH ethanol locomotive could also reduce greenhouse gas emissions.

Costs

AHL-TECH estimates the ethanol-electric hybrid locomotive cost to be about \$1.5 million.

Cost-Effectiveness

At this time, staff does not have actual emissions data to be able to calculate cost-effectiveness.

E. Use CARB Diesel for All Interstate Line Haul Locomotives

1. Background

An intrastate locomotive is defined in ARB's regulation as operating within California for at least 90 percent of its annual fuel consumption, annual hours of operation, or annual miles traveled within California. California Code of Regulations (CCR) Sections 2281, 2282, 2284, and 2299 require intrastate locomotives to be refueled with CARB diesel beginning on January 1, 2007.

Recent detailed surveys and bills of lading determined that UP and BNSF may be approaching 100 percent CARB diesel fuel dispensed to both intrastate and interstate locomotives within California. As a result, California and adjacent states (e.g., Oregon, Nevada, Arizona, Utah, and New Mexico) may be receiving significant levels of additional emissions reductions than anticipated under the original CARB diesel fuel regulation for intrastate locomotives.

PRELIMINARY DRAFT

ultra low sulfur (15 ppmw) diesel fuel in most out-of-state locations as early as 2010. Also, note U.S. EPA nonroad diesel fuel in-use sulfur levels, on average, are about 350 ppmw versus the maximum of 500 ppmw.

When UP and BNSF trains arrive to California, nearly 100 percent of refueling is with CARB diesel. At a minimum, UP and BNSF locomotives will refuel in California with U.S. EPA onroad ultra low (15 ppmw) sulfur diesel fuel. Ultra low sulfur (15 ppmw) diesel fuel is only allowed in California. This is because Kinder Morgan and the major refiners only allow ultra low (15 ppmw) sulfur diesel fuel to be moved through the state's pipelines. These same pipelines also supply California's neighboring states of Nevada (nearly 100 percent of state's fuel – Reno and Las Vegas), Arizona (about 66 percent of state's fuel), and southern Oregon (about 33 percent of state's fuel).

At this time, CARB diesel fuel supply is limited to California borders, but under this option would be trucked or moved via trains to UP and BNSF out-of-state major refueling depots in Wyoming and New Mexico. However, truck and train emissions from transporting CARB diesel fuel to the UP and BNSF out-of-state refueling depots could potentially offset part or all of emissions reductions from this option.

Potential Emissions Reductions

TxLED in El Paso? maybe not...

Texas pipelines carrying CARB diesel to

Calif.?

Valero.

CARB diesel is estimated to provide a 14 and 6 percent reduction in particulate matter (PM) and oxides of nitrogen (NOx) emissions, respectively, as compared to both U.S. EPA ultra low sulfur (15 ppmw) onroad and low (500 ppmw) sulfur nonroad diesel fuels. See the table below for explanation of the different types of diesel fuels available in the United States and the key diesel fuel specifications.

The Valero refinery in Three Rivers, TX makes CARB diesel, piped to California.

**Table IV – 1
ARB and U.S. EPA Diesel Fuels – Key Standards and Implementation Dates**

Type of Diesel Fuel	Implementation Date	Maximum Sulfur (ppmw)	Maximum Aromatics (% by Volume)	Minimum Cetane Index
CARB	2006	15	10 *	40 *
EPA Onroad	2006	15	35	40
EPA Nonroad	2007	500 **	35	40
EPA Nonroad (Offroad)	2010	15	35	40
EPA Nonroad (Locomotives and Marine Vessels)	2012	15	35	40

* Or meet an alternative formulation that provides equivalent emissions reductions to that obtained with a 10 percent aromatic flat limit. In California, that can mean on average about 20% aromatics and about a 50 cetane index.

** On average, in-use sulfur levels are about 350 ppmw.

PRELIMINARY DRAFT

Based on the ARB staff report (Extension of CARB Diesel Requirements to Intrastate Locomotives, October 1, 2004), staff estimates that CARB diesel is providing up to 3 and 0.3 tons per day of NOx and PM statewide emissions reductions from the use of CARB diesel dispensed to both intrastate and interstate line haul locomotives within California.

Under this option, locomotives would refuel with CARB diesel in Wyoming, New Mexico, and Texas. The potential locomotive CARB diesel emissions reductions would benefit many of the states that the locomotives would operate in prior to entering California. However, the CARB diesel fuel emissions reductions within California would be limited to those areas between the states borders and the next California refueling depot. For example, for UP from about Truckee to Roseville California, from Las Vegas Nevada border to Yermo, California, and west of Tucson Arizona to Colton, California. For BNSF, from Needles to Barstow, California.

Staff assumed there were about 300 locomotives per day inbound to California on the UP and BNSF interstate line haul locomotive routes. The potential CARB diesel fuel emissions reductions for this option would be for about 100 miles from California boundaries to the nearest California refueling depots. At about 450 gallons consumed per locomotive per 100 miles, the 300 locomotives would consume about 135,000 gallons of diesel fuel per day. Assuming on average the UP and BNSF operate Tier 0 line haul locomotives on these routes, the locomotives emissions would be about 29.5 and 1.9 tons per day of NOx and PM, respectively. The use of CARB diesel fuel (6% NOx and 14% PM) would provide about 1.8 and 0.26 tons per day of NOx and PM emissions reductions, respectively.

Staff has assumed trains would supply the CARB diesel fuel to Rawlins, WY, Belen, NM, and El Paso, TX – which would be the most fuel and emissions efficient. A CARB diesel fuel unit train (moving only one type of commodity) with 100 tanker cars could carry up to a maximum 2.5 million gallons of CARB diesel fuel. Assuming the 300 locomotives are refueled with 4,000 gallons at the major refueling depots, there would be a need for 1.2 million gallons of diesel fuel per day. At this rate, a CARB diesel fuel unit train would be needed every other day.

Assuming one unit train could deliver the CARB diesel to each refueling depot, the unit train would emit about 3.5 and 0.22 tons per day of NOx and PM, respectively. Heavy-duty diesel trucks operating at higher speeds and traveling similar levels of miles would produce similar levels of emissions. Staff assumes the unit train would emit about 15 percent of those emissions within California borders or about 0.5 and 0.03 tons per day. As a result, the net statewide emissions benefit might be as much as about 1 and 0.2 tons per day of NOx and PM, respectively, for the areas between state boundaries and the next California refueling depot.

- do not forget, you would be putting 4000 gal of CARB diesel into 1000 gallons of remaining EPA diesel, so your emissions benefits will be diluted by about 20%.

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Costs

ARB staff estimated (Extension of CARB Diesel Requirements to Intrastate Locomotives, October 1, 2004) that CARB diesel would increase diesel fuel production costs for California refiners by 3 cents per gallon as compared to non-CARB diesel fuels. Staff estimates that all statewide locomotive diesel fuel consumption (i.e., UP and BNSF, intrastate passenger locomotives, and Class III and military/industrial railroads) is up to 220 million gallons annually (Extension of CARB Diesel Requirements to Intrastate Locomotives, October 1, 2004). At 3 cents per gallon production costs, this would equate to about \$6.6 million additional annual diesel fuel production costs. Note these costs do not take into account retail diesel fuel costs paid by railroads.

Cost-Effectiveness

~ of the transportation costs, right? Remember that every-other-day train, the cost of the tank cars, and the maintenance of those cars.....

Staff estimated 1.2 tons per day of NOx and PM of CARB diesel statewide emissions reductions. Staff estimated a minimum of \$36,000 per day increase in fuel costs, and not accounting for transportation costs. Based on these assumptions, the annualized cost-effectiveness would be about \$15 per pound of NOx and PM reduced.

40 CFR
see 92.601-607

F. Locomotive Emissions In-use Testing

1. Background

→ Note that there are really 2 EPA in-use test programs.
1. Certificate holder requirements
2. End-of-useful life testing - RRS.

Federal locomotive emissions in-use testing requires railroads to test a small but representative sample of the national locomotive fleet to ensure that locomotives continue to meet federal emission standards over locomotive operational lifetimes. The U.S. EPA test procedures used for locomotive in-use testing are the same test procedures (i.e., 40 CFR Part 92) used for certification. Performing annual in-use testing is critical to the overall success and integrity of the federal locomotive emission program. A California locomotive emissions in-use testing program would mirror the federal program, but test a random sample of locomotives operating in California.

92.1003

2. Analysis of Option 28 – California Locomotive In-Use Testing Programs

Technical Feasibility

2005-7
2006-7
2007-7+4=11
2008=23

A California specific in-use locomotive emission testing program is technologically feasible. The federal locomotive emissions in-use testing program is ongoing and has been in place since 1998. In 2007, 15 locomotives representing the national fleet for pre-Tier 0 (unregulated), Tier 0, Tier 1, and Tier 2 locomotives have been tested annually since 2005. All ~~in-use~~ locomotives tested were in compliance and measures with emissions levels well below applicable U.S. EPA locomotive not-to-exceed locomotive emission standards. The federal test procedure (FTP) locomotive emission tests were all conducted at Southwest Research Institutes (SwRI's) facility in San Antonio, Texas at a cost of about \$25,000 per locomotive.

update

[in 2008, MotivePower in Boise was also contracted by the ARR to perform testing. planned on 6, I think. Boise ~~was~~ could not do all 6 locos by years end, so SwRI did 2 more.... in the last week of 2008.

PRELIMINARY DRAFT

Potential Emissions Reductions

There are no data currently available to determine if a California in-use locomotive emissions testing program would provide additional emissions reductions beyond the federal in-use locomotive emissions testing program. Locomotive emissions could potentially increase by performing additional emission testing of complying locomotives at California facilities. A California locomotive in-use testing program would be a complement, and possibly be redundant, to the federal locomotive in-use emission testing program. The federal in-use locomotive emissions testing is currently performed outside of California and is considered by U.S. EPA to be the most comprehensive for any of the emissions source categories.

likely

Pursuant to the 2005 ARB/Railroad Agreement, ARB staff has inspected over 4,000 locomotives in 32 designated and covered railyards and statewide over the past three years. ARB inspectors have not issued a single Notice of Violation for any locomotive exceeding federal locomotive emission opacity standards. In addition, the SwRI federal locomotive in-use emission testing program has not found any locomotives to date that have exceeded federal locomotive emissions standards.

The U.S. EPA locomotive emissions standards require locomotives "not-to-exceed" the emissions standards over the operating life of the locomotive. As a result, most of the SwRI in-use locomotive emission tests have measured emissions levels up to 20 percent below U.S. EPA locomotive emissions standards. Based on the ARB inspections and U.S. EPA in-use locomotive emission testing results, there may be little, if any, locomotives that would have been identified as exceeding U.S. EPA locomotive emissions standards with a California locomotive in-use emissions testing program.

Costs

- plus, you have the comprehensive BNSF & UP visible opacity programs to catch mechanical problems early.

Currently, there are no California facilities designed or built with the necessary dynamic brake load banks and fully U.S. EPA certified testing equipment to perform 40 CFR Part 92 in-use locomotive emission testing. Based on the costs for the SwRI locomotive emissions testing facilities, a California dedicated locomotive emissions testing facility could cost millions. As an alternative to a dedicated California facility, California could contract out the locomotive in-use emission testing to SwRI's mobile lab. SwRI could come to California annually to perform the testing, and with the SwRI mobile lab, it would cost about \$50,000 per locomotive emissions test.

See earlier note with #s each year.

In 2005 to 2007, SwRI conducted the federal in-use locomotive emissions testing program for 15 locomotives. These 15 locomotives were a representative sample of the national locomotive fleet with pre-Tier 0, Tier 0, Tier 1, and Tier 2 locomotives. If a similar number of locomotives were tested in California, the costs would be estimated to be about \$750,000 dollars annually.

tier 0 credit,

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Cost-Effectiveness

At this time, there are insufficient data to estimate potential emissions reductions for this option. Ongoing federal annual in-use testing of existing locomotives demonstrates that locomotives tested typically comply, and in many cases, are well below U.S. EPA locomotive emissions standards. In some cases, in-use locomotive emissions levels can be up to 20 percent below U.S. EPA locomotive emissions standards. There are currently no data to suggest additional California in-use locomotive emission testing would provide additional emissions reductions within the state. As a result, staff has not calculated cost-effectiveness for this option.

applicable

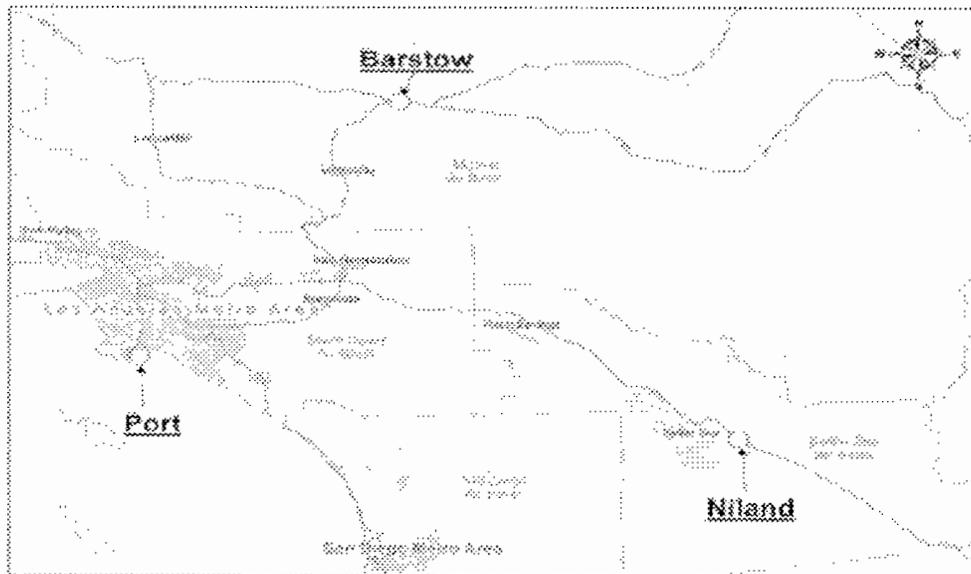
G. Electrify Major Freight Rail Lines in the South Coast Air Basin

1. Background

In this option, staff assesses the potential to electrify two main rail lines from the Ports of Los Angeles and Long Beach to BNSF Barstow/UP Yermo and UP Niland. The current rail infrastructure is used exclusively by diesel-electric locomotives on traditional rail ties. Electrification would involve the installation of high voltage overhead power lines to supply power to fully electric locomotives. This option would require the purchase of all new electric locomotives and significant changes to the current infrastructure. Some segments, like the Alameda corridor, have been constructed to potentially make the transition to electrification somewhat easier.

?

or dual-mode



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2. ***Analysis of Option 29 - Electrify Major Freight Lines in the SCAB to BNSF Barstow/UP Yermo and UP Niland***

Technical Feasibility

The economic and operational feasibility of freight rail electrification in the United States is currently under evaluation via a number of studies (e.g., Southern California Association of Governments (SCAG) rail study). From a technological standpoint, electrification is feasible. Electrified rail is an existing technology currently utilized for container freight transport in many countries, notably countries in Europe. In Europe, however, they employ a number of smaller horsepower locomotives than the diesel-electric locomotives used in the United States. In addition, some passenger lines in a number of countries, including the United States, are currently electrified.

Europe has seen a dramatic shift in moving freight with rail to moving freight with trucks over the past ten years. One of the key reasons for this dramatic shift has been the incompatibility of electric rail infrastructure between multiple countries and the differences in needs for higher electric voltage for freight versus passenger rail. In the United States, if a uniform federal standard was adopted for electric rail infrastructure, we could avoid some of the electric infrastructure incompatibility issues experienced in Europe. Also, electric rail infrastructure would need to have higher voltage levels for freight trains as compared to passenger trains. Freight trains pull mile long or so densely weighted railcars whereas passenger locomotives may pull only passengers housed in a relatively few passenger cars.

Both UP and BNSF operate national systems which will continue to run on diesel-electric locomotives, even if rail electrification were to be implemented in the South Coast Air Basin. This would create a problem of interface between the electrified geographical areas and the areas running on diesel-electric. There are two main ways in which this problem could be addressed: 1) the use of dual mode locomotives, or 2) the use of a switchout or interchange point.

fact check -
Dual mode locomotives are made to run on both diesel and electricity. Dual mode locomotives are available for passenger rail; however they tend to be about 5 times as expensive (\$10 million) as comparable diesel-electric locomotives (\$2 million). Dual mode locomotives also have a significantly reduced range in a diesel mode. Under the dual mode approach, all locomotives on routes entering the South Coast Air Basin would have to be dual mode. In order to ensure that there is a large enough pool to constantly supply the South Coast Air Basin with dual mode locomotives, on any given day, the railroads (UP and BNSF) would likely have to purchase about 2,000 dual mode locomotives. At \$10 million per locomotive, that would equate to about \$2 billion.

The use of a switchout point would serve as an interface between the electrified areas and the areas in which diesel-electric locomotives are utilized. This would involve an unknown increase in shipping time as changing locomotives involves the checking of air brakes and, likely, a crew change. The amount of increased time may be anywhere

PRELIMINARY DRAFT

between a few hours to nearly an extra day. Also, additional tracks would have to be installed at the interchange facilities to accommodate the large number of changes between the different types of locomotives. This could create an adverse impact on the movement of interstate commerce and potentially be subject to litigation.

There are currently no all electric freight locomotives being produced or available for purchase on the open market in the United States. Creation of customer demand could help spur production and commercial availability. Passenger electric locomotives are available. However, passenger electric locomotives have significantly lower horsepower, and perform a much lighter duty cycle, than the diesel-electric locomotives currently used for interstate freight transport.

fact check - not necessarily - sometimes higher! Amtrak AEM-7 Locomotives on The Northeast Corridor are 7,000 hp

The technology for installation of high voltage overhead power lines is currently available. Based on the experience in Europe, it is likely that electrification would only be applied on the main lines, and not in the switching and cargo handling areas of railyards. In railyards, complications may arise with cargo handling equipment, such as Rubber Tired Gantry (RTGs) cranes, which are tall enough to interfere with overhead electric lines.

This option would not affect emissions from passenger locomotives, but could be expanded to include passenger rail (e.g., for those lines where passenger and freight locomotives share track).

Potential Emission Reductions

According to the 2008 ARB emission inventory, locomotive diesel PM and NOx emissions in the South Coast Air Basin (SCAB) are about 0.8 and 20 tons per day, respectively. Interstate line haul locomotives account for about 80 and 72 percent, respectively, of the SCAB locomotive diesel PM and NOx emissions. Electrification of the freight lines would reduce these emissions to essentially zero, not accounting for the electric power generating source.

Staff assumes emissions from electrical generation units in the South Coast Air Basin are controlled effectively through the use of natural gas fuel and selective catalytic reduction for NOx controls. As a result, rail electrification could result in large net emission reductions of particulate matter (PM) and NOx, and total elimination of diesel PM emissions. If interstate line haul freight lines in the South Coast Air Basin were electrified, diesel PM and NOx emissions from the locomotives themselves would be reduced by 80 and 72 percent to about 0.16 and 5.5 tons per day, respectively. The net emissions reductions for the South Coast Air Basin would be 14.2 and 0.7 tons per day of NOx and PM, respectively. There may be additional spillover emissions benefits in both the Mojave and Salton Sea air basins as well.

Again, compared to "do nothing". Need to compare to a Tier 4 fleet in the future.

Electrification of smaller segments (e.g. as an initial step in a regional system) would have correspondingly lower regional emissions benefits, but reduced diesel PM emissions near such segments could assist in reducing significant localized health risks.

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For example, as was noted above, the Alameda Corridor (approximately 22 miles long) was constructed (with dedicated track from ports to downtown Los Angeles) to more easily accommodate electrification. ARB railyard health risk assessments for railyards at either end of the South Coast Air Basin rail corridors found significant diesel PM cancer risks. The SCAQMD Multiple Air Toxics Exposure Study also found the South Coast Air Basin to have relatively high diesel PM related cancer risks within the region.

Finally, rail electrification would provide significant reductions of greenhouse gas emissions and assist the state in meeting its goals under AB 32, particularly as greater portions of electricity generation is based on renewable sources. *could - depends on how + where you get the electricity from.*

Costs

As part of its 2008 Regional Transportation Plan, SCAG utilized a cost estimate of \$9 million per mile to electrify existing rail lines. ARB staff has found some estimates as high as \$50 million per mile. Actual costs would depend on the configuration of existing infrastructure and its ability to accommodate electrification. Segments such as the Alameda Corridor that have been constructed in a manner that will accommodate rail electrification would, presumably, have electrification costs that would not be at the higher end of these estimates.

In addition, proposals have been made to substantially expand the current rail system by double or triple tracking substantial segments through the SCAB. The incremental costs to build electrification into such new segments would presumably be less than the cost to retrofit existing lines.

A new electric freight locomotive is estimated to cost between \$4 million and \$10 million. SCAG's analyses, which included the renovation of 460 miles of track and the purchase of 775 electric freight locomotives, estimated total costs of \$6.4 billion. ARB staff has done an analysis using the same miles of track and locomotives, and estimated that costs could approach \$13 billion.

The overall costs will depend on the amount of rail miles electrified. Short term proposals could start with electrification from the ports to the nearest intermodal facilities, followed by the Alameda Corridor.

Cost-Effectiveness

Assuming a lifetime of 30 years, the annualized cost would be about \$40 per pound of NOx and PM reduced.

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750,000 to 1.5 million lifts. The proposed BNSF SCIG railyard is expected to process up to 1.5 million lifts each year by about 2015, and staff assumed BNSF SCIG would have similar levels of drayage truck emissions as UP ICTF. UP ICTF and BNSF SCIG combined then would have railyard diesel PM emissions of about 5 tons per year in 2016.

Staff estimates that the drayage truck diesel PM emissions from movement of containers from the Ports of Los Angeles and Long Beach to the BNSF SCIG and UP ICTF railyards would be about 7.1 tons per year in 2016 for about 3 million lifts. Under these assumptions, Maglev could potentially reduce total drayage truck diesel PM emissions by up to about 12 tons per year in 2016. Using a factor of 20 for NOx, the corresponding NOx emissions reductions could be up to 240 tons per year.

Costs

The estimated costs for Maglev projects have ranged from \$65 million to \$100 million per mile. At these rates, Maglev capital costs for 4.7 miles of track would range between \$306 million and \$470 million. One Maglev proposal from the Ports of Los Angeles and Long Beach to BNSF SCIG and UP ICTF estimated costs as high as \$575 million.

Cost-Effectiveness

Assuming a project lifetime of 15 years, and 12 tons per year of drayage truck diesel PM emissions reduced per year, and up to 240 tons per year of drayage truck NOx emissions reduced per year, the cost effectiveness could range from about \$40 to \$105 per pound of diesel PM and NOx reduced. The cost-effectiveness would largely depend on the capital costs that staff estimated would range between \$300 and \$800 million.

— Again, compared to "do nothing",
Should compare to 2012, when all drayage trucks
are 2007/2010 emissions compliant.

I. Retrofit of Existing Major Rail Infrastructure with Linear Induction Motors (LIMs) in the South Coast Air Basin

1. Background

Linear Induction Motors (LIMs) are an advanced method of train propulsion. The key aspect of LIMs, which differentiates them from traditional rail propulsion, is that the motor does not turn the wheels, but rather it pushes the train along the track. LIMs use a varying electrical current running along a line in the track or on the train to create a magnetic field which repels a coil, or other inductive mechanism, and pushes the train along the track. LIMs can be used in conjunction with maglev or with steel wheel on steel rail systems. This option focuses on the application of LIMs to steel wheel on steel rail.

There are at least 10 current implementations of LIMs to passenger systems. They tend to be short in length, with the majority less than 15 miles long. The longest line currently using LIMs is Vancouver's SkyTrain system which is 31 miles long and has

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been in operation since 1985. There are two major manufacturers of LIMs passenger systems: Bombardier and Kawasaki Heavy Industries. Existing LIMs systems make use of an onboard linear induction motor powered by an external electric source, and an inductive mechanism in the tracks such as a coil or a plate.

This option would include the retrofit of existing diesel-electric locomotives and rail cars with inductive devices and installation of the linear motor in the track, opposite of how LIMs has been implemented in existing rail service. This option would also include the installation of the corresponding electric infrastructure along existing rail track. A pool of about 2,000 UP and BNSF locomotives operating in the South Coast Air Basin would need to be retrofitted with LIMs technology. A train equipped with LIMs can either be powered solely by the retrofit of locomotives with a plate or coil, or all of the railcars can be equipped with a plate or coil which reduces the need for high power linear motors in the track.

2. Analysis of Option 31 - Retrofit of Existing Major Rail Infrastructure with Linear Induction Motors (LIMs) in the South Coast Air Basin

Technical Feasibility

The economic and operational feasibility of this option are under evaluation. Although LIMs has been applied to passenger rail systems with success, the difference in method of operation as well as loads and distances makes the implementation of LIMs to freight rail uncertain. There are no existing freight LIMs systems in place; however General Atomics has a 100 foot long test track, which uses the same motor in track setup, to test freight maglev.

Potential Emission Reductions

If LIMs were to be implemented throughout the SCAB, the emission reductions would be similar to those of electrifying the rail. As shown in Table X this would result in emission reductions of about 81% and 72% for diesel PM and NOx respectively. This reduction only considers the emissions from the locomotive, not including power plant emissions which are assumed to be well controlled in the SCAB and would yield a net decrease in emissions. The net emissions reductions for the South Coast Air Basin would be 14.2 and 0.7 tons per day of NOx and PM, respectively.

**Table IV-2
Emission Reductions due to LIMs in the SCAB**

Pollutant	2010	LIMS	% Reduced
PM (tons/day)			
Main Line	0.69	0	100%
Total	0.85	0.16	81%
NOx (tons/day)			
Main Line	14.24	0	100%
Total	19.69	5.45	72%

PRELIMINARY DRAFT

for what year?

Diesel PM Emissions from Eighteen Major California Railyards
(tons per year)

Railyard	Locomotive	Cargo Handling Equipment	On-Road Trucks	Others (Off-road, TRUs, Stationary, etc.)	Total [§]
South Coast Air Quality Management District					
BNSF Hobart	5.9	4.2	10.1	3.7	23.9
UP ICTF/Dolores	9.8	4.4	7.5	2.0	23.7
BNSF San Bernardino	10.6	3.7	4.4	3.4	22.0
UP Colton	16.3	N/A	0.2	0.05	16.5
UP Commerce	4.9	4.8	2.0	0.4	12.1
UP City of Industry	5.9	2.8	2.0	0.3	10.9
UP LATC	3.2	2.7	1.0	0.5	7.3
UP Mira Loma	4.4	N/A	0.2	0.2	4.9
BNSF Commerce Eastern	0.6	0.4	1.1	1.0	3.1
BNSF Sheila	2.2	N/A	N/A	0.4	2.7
BNSF Watson	1.9	N/A	<0.01	0.04	1.9
Bay Area Air Quality Management District					
UP Oakland	3.9	2.0	1.9	3.4	11.2
BNSF Richmond	3.3	0.3	0.5	0.6	4.7
San Joaquin Valley Unified Air Pollution Control District					
UP Stockton	6.5	N/A	0.2	0.2	6.9
BNSF Stockton	3.6	N/A	N/A	0.02	3.6
San Diego Air Pollution Control District					
BNSF San Diego	1.6	N/A	0.007	0.04	1.7
Mojave Desert Air Quality Management District					
BNSF Barstow	27.1	0.03	0.04	0.75	27.9
Placer County Air District/Sac Metro AQMD					
UP Roseville	25.1	N/A	N/A	N/A	25.1
STATEWIDE RY TOTAL	136.8	25.33	31.15	17.0	210.1 [§]
Statewide RY Percent	65 percent	12 percent	15 percent	8 percent	100 percent

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Snapshot for what year?

Diesel PM Emissions from 18 Major Railyards Summarized By Source Category

18 Major Railyards	Diesel PM Emissions (tons per year)	Percent of Railyard Diesel PM Emissions
Locomotives	137	65%
- Line Haul	65	48%
- Switch	57	42%
- Service/Testing	15	10%
Diesel Trucks	31	15%
Cargo Equipment	25	12%
TRUs/Other	17	8%
Total	210	100%

Estimated Railyard Diesel PM Emissions and Reductions from 2005 to 2020
(tons per year)

YEAR	TOTAL*	Percent Reduction from 2005	Line Haul Locomotives**	Switch Locomotives***	Service/Test Locomotives	HDD Trucks	Cargo (CHE)	TRUs	Other (Stationary)
2005	210	-	65	57	15	31	25	15	2
2010	105	50%	33	29	13	6	13	9	2
2015	74	65%	31	13	10	5	9	5	1
2020	42	80%	17	6	7	4	5	2	1

* Assumes an average of 80 percent diesel PM emission reductions for 18 classification and intermodal railyards.
 ** Assumes full implementation of 1998 and 2008 U.S. EPA rulemakings, 1998 and 2005 ARB/Railroad Agreements, CARB or ULSD for all California locomotives, and beginning of introduction of Tier 4 locomotives nationally between 2015 and 2020.
 *** Assumes statewide replacement with advanced technology switch locomotives at 90% PM control with use of CARB diesel.

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The Table below provides an estimate of diesel PM emissions and reductions for 8 railyards through 2020. These estimates are based on the draft UP and BNSF railyard mitigation plans submitted to date. The estimates are also based on commitments UP and BNSF have made since the release of the draft railyard mitigation plans.

Estimated Railyard Diesel PM Emissions and Reductions for Eight Railyards
(tons per year)

Railyard	2005	2010	2015	2020	Additional Reductions ¹	Goals for 2020 ²
BNSF Hobart (MICR: 500 ⁴)	24.7 Reduction	9.5 61%	6.4 74%	4.2 83%	3.2 87%	1.3 95%
UP Commerce (MICR: 500 ⁴)	11.2 – 9.6 Reduction	5.4 52%	3.7 67%	2.9 (2.3) ³ 74% (80%)	1.7 (1.1) ³ 85% (90%)	0.6 95%
BNSF Commerce/ Eastern (MICR: 100 ⁴)	3.1 – 2.7 Reduction	1.16 62%	0.83 73%	0.65 79%	N/A N/A	0.65 79%
BNSF Sheila (MICR: 40 ⁴)	2.7 Reduction	N/A N/A	N/A N/A	N/A N/A	N/A N/A	1.7 37%
BNSF San Bernardino (MICR: 2,500 ⁴)	22.0 - 22.4 Reduction	12.0 46%	8.2 63%	5.4 76%	4.1 82%	1.9 91%
UP ICTF/Dolores (MICR: 800 ⁴)	20.3 Reduction	11.8 42%	6.5 68%	5.4 73%	3.2 84%	0.6 97%
UP Oakland (MICR: 460 ⁴)	11.2-9.9 Reduction	5.9 57%	4.0 64%	3.2 71%	2.0 82%	0.5 95%
UP Industry (MICR: 450 ⁴)	10.9-9.8 Reduction	4.8 56%	3.3 70%	2.6 75%	N/A N/A	0.55 95%

1. Achieved through underestimated benefits of ARB regulations (CHE, Trucks) and additional voluntary options (e.g., replacement of switch locomotives with gen-sets, accelerated fleet turnover of Cargo Handling Equipment, etc.).
2. Primarily achieved through additional locomotive emissions reductions and site specific options (e.g., trees, walls, etc.).
3. Revised CHE and Truck emissions reductions.
4. 2005 MICR estimate.

PRELIMINARY DRAFT

Still unregulated?

2008 U.S. EPA Locomotive NOx Emission Standards

Type	Tier	Date of Original Manufacture	Existing NOx Standard (g/bhp-hr)	New NOx Standard New and Remanufactured (g/bhp-hr)	Percent Control When Engine is New or Remanufactured*
Line-haul locomotives	<i>Uncontrolled</i>	<i>Pre-1973</i>	13.5	8.0 or 7.4	41 percent or 45 percent
	<i>Tier 0 *</i>	<i>1973 – 2001</i>	9.5	8.0 or 7.4	16 percent or 22 percent
	Tier 1	2002 – 2004	7.4	7.4	0 percent
	Tier 2	2005-2012	5.5	5.5	0 percent
	Tier 3	2012	N/A	5.5	0 percent
	<i>Tier 4</i>	<i>2015-2017</i>	<i>N/A</i>	<i>1.3</i>	<i>76 percent (vs. Tier 2)</i>
Switcher locomotives	<i>Uncontrolled</i>	<i>Pre-1973</i>	17.4	11.8	40 percent
	<i>Tier 0</i>	<i>1973 – 2001</i>	14.0	11.8	16 percent
	Tier 1	2002 – 2004	11.0	11.0	0 percent
	Tier 2	2005-2011	8.1	8.1	0 percent
	<i>Tier 3</i>	<i>2011</i>	<i>N/A</i>	<i>5.0</i>	<i>48 percent (vs. Tier 2)</i>
	<i>Tier 4</i>	<i>2015</i>	<i>N/A</i>	<i>1.3</i>	<i>84 percent (vs. Tier 2)</i>

Note: In most cases, gen-set and electric hybrid switchers have been U.S. EPA NOx emissions certified at levels below 3.0 g/bhphr, without aftertreatment. The LNG units have certification test data below 3.0.

* In most cases, except for Tier 4, as compared to pre-Tier 0 emissions levels

PRELIMINARY DRAFT

2008 U.S. EPA Locomotive PM Emission Standards

Type	Tier	Date of Original Manufacture	Existing PM Standards (g/bhp-hr)	New PM Standards Remanufactured or New (g/bhp-hr)	Percent Control When Engine is New or Remanufactured*
Line-haul locomotives	Uncontrolled	Pre-1973	0.34	0.22	35 percent
	Tier 0	1973 - 2001	0.60	0.22	63 percent
	Tier 1	2002 - 2004	0.45	0.22	49 percent
	Tier 2	2005-2011	0.20	0.10	50 percent
	Tier 3	2012	N/A	0.10	50 percent (vs. Tier 2)
	Tier 4	2014	N/A	0.03	85 percent (vs. Tier 2)
Switcher locomotives	Tier 0	1973 - 2001	0.72	0.26	64 percent
	Tier 1	2002 - 2004	0.54	0.26	48 percent
	Tier 2	2005-2010	0.24	0.13	54 percent
	Tier 3	2011	N/A	0.10	58 percent (vs. Tier 2)
	Tier 4	2015	N/A	0.03	87 percent (vs. Tier 2)

Note: In most cases, gen-set, electric hybrid, and LNG switchers have certification test data at levels below 0.15 g/bhphr, without aftertreatment.

* In most cases, except for Tier 4, as compared to pre-Tier 0 emissions levels.

Should Note ^{✓ Federal} changes in fuel Sulfur content here to go with PM reductions
 Unregulated → 500ppm → 15 ppm

PRELIMINARY DRAFT

CURRENT STATUS OF AFTERTREATMENT FOR EXISTING LOCOMOTIVES

ARB has

We have been working with U.S. EPA, SCAQMD, and UP and BNSF to develop and demonstrate aftertreatment for existing (pre-Tier 0 through Tier 2) interstate line haul, medium horsepower (MHP), and switch locomotives. In this section we will examine the status of the locomotive aftertreatment efforts to date.

A. Background on Aftertreatment

Two aftertreatment options that could be retrofitted to existing locomotives to reduce PM emissions are diesel particulate filters (DPFs) and diesel oxidation catalysts (DOCs). Selective catalytic reduction (SCR) could be retrofitted to existing locomotives to reduce NOx emissions. A key question to be addressed is whether the filters can maintain the anticipated level of control and necessary durability over time, particularly in interstate line haul operations. In addition, it is critical that aftertreatment adversely affect engine exhaust flows and combustion efficiencies, and can fit into the limited areas available within a locomotive carbody space. The latter is critical due to considerations of locomotives being able to travel through tunnels across the nation. Finally, after the aftertreatment has been demonstrated successfully on a single locomotive, the ARB verification process will need to be completed. The final step would be for a manufacturer to make the ARB verified aftertreatment commercially available.

serviceability
reliability

NOT

1. Diesel Oxidation Catalysts (DOCs)

Diesel oxidation catalysts (DOCs) use a catalyst material and oxygen in the air to trigger a chemical reaction that converts a portion of diesel PM and ROG into carbon dioxide and water. These catalysts have been shown to reduce diesel PM emissions by 20 to 50 percent and ROG emissions by up to 30 percent. While diesel particulate filters typically need a low-sulfur content fuel to operate effectively, DOCs are tolerant of higher fuel sulfur contents. DOCs can be effective in controlling soluble organic fraction (SOF – oil and diesel fuel combustion related) emissions from locomotives, but is not as effective as DPFs in controlling fine particulates.

High CO
reductions
also.

after much higher
exhaust

A DOC may be the first line control system needed to enhance the effectiveness of both a DPF and an SCR on locomotives. A DOC can reduce large particles to enhance the efficiency of a DPF and to reduce carbon build up on a DPF's walls. A DOC can also reduce carbon build up for a SCR and increase NO₂ generation to improve SCR control efficiencies.

2. Diesel Particulate Filters (DPFs)

DPFs contain a semi-porous material that permits gases in the exhaust to pass through while trapping the diesel soot, with a PM control efficiency of 85 percent or more. They have been successfully demonstrated in the laboratory and demonstrated on two U.S. switch locomotives (UP and BNSF), where they reduced diesel PM emissions by up to about 80 percent. A concern with the use of DPFs is the high levels of the soluble

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organic fraction, lube oil, and diesel fuel that are emitted from locomotives and that can potentially plug a DPF, thereby requiring extensive cleaning and maintenance.

A passive DPF system relies on locomotive exhaust temperatures to burn away ash and carbon buildup on the DPF. However, locomotives can operate a substantial part of the time in lower power settings, where locomotive exhaust temperatures may not be high enough to burn off carbon build up on DPFs. A regenerative DPF system periodically uses diesel fuel ignition to burn away DPF ash and carbon buildup. As a result, there can be small amounts of diesel PM emissions with the regenerative system. With locomotives, there may be the potential for a hybrid DPF system where passive (for use on higher power settings) and regenerative (for use on locomotive lower power settings) systems are combined.

accumulated DPM

rewrite

Needs work.

2. Selective Catalytic Reduction (SCR)

$NH_4 + NO_x \Rightarrow$ where does the CO_2 come from!!

Another control option for existing locomotives is to retrofit selective catalytic reduction (SCR). SCR is a means of converting NOx with the aid of a catalyst into diatomic nitrogen, N_2 , and water, H_2O . A gaseous reductant, typically anhydrous ammonia, aqueous ammonia, or urea, is added to a stream of flue or exhaust gas and is absorbed onto a catalyst. CO_2 is a reaction product when urea is used as the reductant. SCR catalysts are manufactured from various ceramic materials used as a carrier, such as titanium oxide, and active catalytic components are usually either oxides of base metals (such as vanadium and tungsten), zeolites, and various precious metals. SCR has been used on stationary sources (e.g., boilers) and has been shown to reduce NOx emissions by 70 to 95 percent.

or metallic

One of the key challenges with SCR on an interstate line haul locomotive is being able to design a system that precisely meters urea to approach a one to one conversion ratio between urea to NOx and to minimize potentially toxic emissions from ammonia slip. Further, the lower locomotive engine exhaust temperatures in lower notch settings (i.e., idle to Notch 3) significantly reduce the levels of control from SCR.

may want to describe in more detail

B. Demonstration of DPFs on a Gen-Set Switch Locomotive

Brookville Equipment Company recently installed a passive DPF system on a prototype three engine gen-set switch locomotive built with three Cummins QSK19 Tier 3 nonroad engines. Brookville employed a passive DPF system that relied on locomotive exhaust temperatures to burn away ash and carbon buildup on the DPF. During field testing, Brookville began to experience ongoing ash buildup and cleaning problems with the passive DPF system. As the DPF is not required by any regulation, Brookville chose for the time being to remove the passive DPF system from the prototype gen-set switch locomotive during field testing.

Any technical reports available?
After how many hours? Duty cycle during that time?

You do not burn ash!

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C. Demonstration of Experimental DPFs on Older Switch Locomotives

ARB and the UP and BNSF entered into the California Emissions Program (CEP) in 2001. The two railroads funded this effort with \$5 million, and as of April 2008 about \$4 million or more has been expended. The CEP's primary objective was to demonstrate the use of DPFs on older switch locomotives. UP and BNSF each provided an older (both over 25 years old) switch locomotive of about 1,500 horsepower for this program.

After five years of research and bench testing, the UP and BNSF switch locomotives were retrofitted with very large DPFs (about piano size - 1,100 pounds) in front of the cabs of UPY 1378 and BNSF 3703. Baseline emission testing indicates that these switchers can provide up to an 80 percent reduction in particulate matter and 30 percent reduction in hydrocarbon emissions.

add photo

UPY 1378 ^{is a Tier 0 EMD MP15DC locomotive and} was released into demonstration service in December 2006 to the UP Oakland yard, and then recently transferred to the UP Roseville yard. UPY 1378 has been operating over the past year with only minor mechanical and aftertreatment adjustments. BNSF 3703 was retrofitted with the DPF in late 2006, but for nearly two years ^{had not been able to leave the Southwest Research Institute (SWRI) facility in San Antonio, Texas due to ongoing technical challenges in getting the DPF system to work properly with the locomotive.} In 2008, BNSF 3703 arrived in Southern California for demonstration testing.

save DPF system

remained

address April

efficiency

improving the

An important consideration with DPF retrofits on switch locomotives is the recent advances in switch locomotive technology (i.e., gen-set and electric hybrid) since the CEP program was initiated over 7 years ago. Gen-set and electric hybrid switch locomotives can provide up to a 90 percent reduction in both particulate matter and NOx emissions. These switch locomotives also significantly reduce diesel fuel consumption by 20 to 40 percent.

without aftertreatment

Due to the DPF and engine rebuild (Tier 0) capital costs (\$300,000 to \$500,000 or more) and ongoing maintenance costs of DPFs, the new advanced technology switch locomotives may make the retrofitting of older (20-50 year old) switch locomotives with DPFs less cost competitive with the new switch technologies. In California, an important question would be whether to invest limited capital into aftertreatment retrofits of 25 to 50 year old switch locomotives, or whether to purchase new gen-set switch locomotives instead. The gen-set engines provide ongoing fuel savings and these engines can easily be changed (in a few days) for upgrades to future nonroad engines with even more stringent emission standards.

D. Demonstration of an Experimental Diesel Oxidation Catalyst (DOC) on an Older Freight Line Haul Locomotive

U.S. EPA and UP initiated a demonstration program, in April 2006, on an existing freight line haul locomotive (UP 2368). UP 2368 is an EMD SD60M model interstate freight line haul locomotive built in 1989 and powered by an EMD 710 - 16 cylinder engine. UP

↑ 16-710-G3B

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2368's engine was rebuilt from uncontrolled levels to a Tier 0 level and then retrofitted with a Miratech DOC. UP 2368 was then placed into service in California in October 2006.

UP 2368 baseline emission testing indicated that the DOC could reduce larger particles (e.g., soluble organic fraction) in particulate matter by up to 50 percent. However, during in-field demonstrations in 2007, there were three separate incidents of DOC aftertreatment and DOC support structure failures. The most recent failure resulted in the breakdown of catalysts that broke away from the DOC and flew up into the turbocharger. Fortunately, this failure was caught early enough to prevent any turbocharger or engine damage. Generally, these three DOC related failures have been attributed to locomotive vibration and the large two-stroke medium speed EMD engine with extreme and intermittent exhaust pulsations. Miratech worked on a new DOC design and support frames to protect the integrity of the DOC catalysts under locomotive vibration and stresses, and UP 2368 was returned to service in Southern California in May 2008. UP 2368 has performed successfully for over the past six months, and the same DOCs used on UP 2368 have been retrofitted on two Canadian passenger locomotives.

Not
Correct.

DPM

E. SwRI Bench Test of a Compact SCR on a Locomotive Engine

3000 hp

ARB recently funded a \$200,000 research effort with the SwRI. This research consisted of a bench test program of a compact SCR system offered by Engine Fuel and Emissions Engineering, Inc. (EF&EE) (via Haldor Topsoe – a Danish Catalyst Company) and funded by the SCAQMD for use on a MHP Metrolink passenger locomotives. The SWRI bench tests were conducted on an EMD 710 – 12 cylinder engine, which is the same engine family commonly used on pre-2000 freight line haul locomotives (~75 percent), passenger locomotives (most in California), and some marine vessels. The EMD 710 engine was retrofitted with the compact SCR device for performance and emission testing. During the performance testing, significant issues occurred with the SCR system's ability to dose the urea properly. Part of this urea dosing imbalance was caused by the un-uniform engine exhaust flows of the EMD 710 engine and the challenge for the compact SCR system to be able to adjust urea dosing precisely to the engine exhaust fluctuations. This imbalance in the dosing of the urea resulted in large amounts of ammonia slip and dried ammonia crystals deposited throughout the engine. EF&EE is currently working to redesign the compact SCR and urea dosing system to try to address these issues. SWRI completed the report for this research effort in March 2008.

12-71063

within
the
turbocharger
outlet
The poor
mixing

Insufficient
mixing.

Summary of the Status of Locomotive Aftertreatment

As of November 2008, ARB staff has not verified any locomotive aftertreatment system. Staff is optimistic that candidates for locomotive aftertreatment systems will be submitted for ARB verification sometime in 2009.

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Calculations of Switch Locomotive NOx and PM Emissions:

(Source: U.S. EPA Fact Sheet – Emission Factors for Locomotives – U.S. EPA420-F-97-051 – December 1997)

<http://www.U.S.EPA.gov/otaq/regs/nonroad/locomotv/frm/42097051.pdf>

Switch Locomotive Emission Factors (EF)

(g/bhp-hr)	NOx EF	PM EF
Pre Tier 0	17.4	0.72
Tier 0	14.0	0.72
Tier 0+	11.8	0.26
ULESL	3.0	0.10
Tier 3	3.0	0.10
Tier 4	1.3	0.03
Tier 4 Nonroad	0.3	0.01

too high - ~~14.0~~ is probably closer to real value.

Not a good # to use.

Conversion Factors

bhp-hr/gallon	20.8
tons/g	1.10E-06

$$20.8 \frac{\text{bhp-hr}}{\text{gal}} \div 7.0 \frac{\text{lb}}{\text{gal}} = 0.336 \frac{\text{lb}}{\text{hp-hr}}$$

→ This factor is for 2 engines @ Rated power!

UP and BNSF Switch Locomotive Fleet Composition (2008)

Switchers	# Locos	Pre Tier 0	Tier 0	ULESL
Statewide	244	103	49	92
South Coast	139	34	29	76
Rest of State	105	69	20	16

Other Key Assumptions:

Pre-Tier 0 and Tier 0 switch locomotives are assumed to consume 50,000 gallons of diesel fuel per year. ULESLs, Tier 3, and Tier 4 switch locomotives are assumed to consume 40,000 gallons of diesel fuel per year due to 20% reduction with ULESLs: gen-sets, electric hybrids, and LNGs.

UP 41378
To 2nd MP15DC

LA = 411 → 17.0 $\frac{\text{hp-hr}}{\text{gal}}$
 SW = 451 → 15.5 $\frac{\text{hp-hr}}{\text{gal}}$

Line-Haul = To SD50 = 18.1 $\frac{\text{hp-hr}}{\text{gal}}$
 Switch To SD50 = 14.8 $\frac{\text{hp-hr}}{\text{gal}}$

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Replace 152 older UP/BNSF switchers with new ULESL switch locomotives

<u>Emission Reduction (TPD)</u>	<u>NOx</u>	<u>PM</u>
Statewide	6.6	0.30
South Coast	2.8	0.14
Rest of State	3.8	0.16

NOx:

NOx Baseline Emissions – 17.4 g/bhp-hr x 20.8 = 362 grams/gallon

103 pre-Tier 0 UP and BNSF Switch Locomotives

50,000 gallons/yr x 362 grams/gallon = 18,100,000 grams/yr/454 g/lb = 39,867.84 lbs/yr/2,000 lbs/ton = 19.93 tons/yr/365 days/yr = 0.0546 tons/day NOx x 103 pre-Tier 0 switchers = 5.625 tons/day NOx emissions.

NOx Baseline Emissions – 14.0 g/bhp-hr x 20.8 = 291 grams/gallon.

49 Tier 0 UP and BNSF Switch Locomotives

50,000 gallons/yr x 291 grams/gallon = 14,550,000 grams/yr/454 g/lb = 32,048.46 lbs/yr/2,000 lbs/ton = 16.0 tons/yr/365 days/yr = 0.0439 tons/day NOx x 49 Tier 0 switch locomotives = 2.15 tons/day NOx emissions.

103 pre-Tier 0 UP/BNSF switch locomotives + 49 Tier 0 UP/BNSF switch locomotives =

(5.625 tons/day) + (2.15 tons/day) = 7.776 tons/day NOx or 7.8 tons/day.

NOx baseline emissions for 152 older UP/BNSF switchers = 7.8 tons/day.

NOx Control Emissions – 3.0 g/bhp-hr x 20.8 = 62 grams/gallon.

152 ULESL UP and BNSF Switch Locomotives (20% Diesel Fuel Reduction)

40,000 gallons/year x 62 grams/gallon = 2,480,000 grams/yr/454 g/lb = 5,462.55 lbs/yr/2,000 lbs/ton = 2.73 tons/yr/365 days/yr = 0.00748 tons/day NOx x 152 ULESLs = 1.1374 tons/day NOx controlled emissions or 1.14 tons/day NOx controlled.

NOx baseline emissions (7.776 tons/day) – NOx control emissions (1.1374 tons/day) = 6.6386 tons/day NOx reduced or 6.64 or 6.6 tons/day NOx reduced.

PM:

PM Baseline Emissions – 0.72 g/bhp-hr x 20.8 = 15 grams/gallon.

152 pre-Tier 0 and Tier 0 UP and BNSF Switch Locomotives

50,000 gallons/yr x 15 grams/gallon = 750,000 grams/yr/454 g/lb = 1,651.98 lbs/yr/2,000 lbs/ton = 0.826 tons/yr/365 days/yr = 0.002263 tons/day PM x 152 pre-Tier and Tier 0 switchers = 0.344 tons/day PM baseline emissions.

PM Control Emissions – 0.1 g/bhp-hr x 20.8 = 2 grams/gallon.

152 ULESL UP and BNSF Switch Locomotives (20% Diesel Fuel Reduction)

40,000 gallons/year x 2 grams/gallon = 80,000 grams/yr/454 g/lb = 176.21 lbs/yr/2,000 lbs/ton = 0.088 tons/yr/365 days/yr = 0.00024 tons/day PM x 152 ULESLs = 0.03669 tons/day PM controlled emissions or 0.037 tons/day PM controlled.

PM baseline emissions (0.344 tons/day) – PM control emissions (0.037 tons/day) = 0.307 tons/day PM reduced or 0.31 or 0.3 tons/day PM reduced.

Cost-effectiveness:

1 year: (6.6+0.3)x(2,000 lbs/ton) x (365 days/yr) x (1 yr) = 50,370,000 lbs/yr.

10 years: (6.6+0.3)x(2,000 lbs/ton) x (365 days/yr) x (10 yrs) = 50,370,000 lbs/10 yrs.

20 years: (6.4+0.3)x(2,000 lbs/ton) x (365 days/yr)x(20 yrs) = 100,740,000 lbs/20 yrs.

Capital costs: \$1,500,000/ x 152 gen-set or ULESL locomotives = \$228,000,000

Cost-effectiveness = \$(228,000,000/100,740,000 lbs/20 yrs) to \$(228,000,000/50,370,000 lbs/10 yrs) = \$2.26/lb to \$4.53/lb or **(\$2-5/lb)**

PRELIMINARY DRAFT

DPF and SCR Retrofits of 244 UP/BNSF ULESLs Switch Locomotives:

<i>Emission Reduction(TPD)</i>	NOx	PM
Statewide	1.0	0.04
South Coast	0.6	0.02
Rest of State	0.4	0.02

NOx:

NOx Baseline Emissions – 3.0 g/bhp-hr x 20.8 = 62 grams/gallon.

244 UP and BNSF ULESLs (20% Diesel Fuel Reduction)

40,000 gallons/yr x 62 grams/gallon = 2,480,000 grams/yr/454 g/lb=5,462.55 lbs/yr/2,000 lbs/ton=2.73 tons/yr/365 days/yr=0.00748 tons/day NOx x 244 ULESLs = 1.825 tons/day NOx baseline emissions or **1.8 tons/day NOx baseline emissions.**

NOx Control Emissions – 1.3 g/bhp-hr x 20.8 = 27 grams/gallon.

244 UP and BNSF ULESLs Retrofitted with SCR (20% Diesel Fuel Reduction)

40,000 gallons/yr x 27 grams/gallon = 1,080,000 g/yr/454 g/lb=2,378.85 lbs/yr/2,000 lbs/ton=1.1894 tons/yr/365 days/yr=0.003258 tons/day NOx x 244 ULESLs retrofitted with SCR = **0.795 tons/day NOx controlled.**

NOx baseline emissions (1.8 tons/day) – NOx control emissions (0.795 tons/day) = **1.0 tons/day NOx reduced.**

PM:

PM Baseline Emissions – 0.1 g/bhp-hr x 20.8 = 2 grams/gallon.

244 UP and BNSF ULESLs (20% Diesel Fuel Reduction)

40,000 gallons/year x 2 grams/gallon = 80,000 grams/yr/454 g/lb=176.21 lbs/yr/2,000 lbs/ton=0.088 tons/yr/365 days/yr=0.00024 tons/day PM x 244 ULESLs = 0.05856 tons/day PM baseline emissions or **0.059 tons/day PM baseline emissions.**

PM Control Emissions – 0.03 g/bhp-hr x 20.8 = 0.624 grams/gallon.

244 UP and BNSF ULESLs Retrofitted with DPFs (20% Diesel Fuel Reduction)

40,000 gallons/yr x 0.624 grams/gallon = 24,960 g/yr/454 g/lb=54.98 lbs/yr/2,000 lbs/ton=0.0275 tons/yr/365 days/yr=0.0000753 tons/day PM x 244 ULESLs retrofitted with DPFs = **0.018 tons/day NOx control emissions**

PM baseline emissions (0.059 tons/day) – PM control emissions (0.018 tons/day) = 0.041 tons/day PM reduced or **0.04 tons/day PM reduced.**

Cost-effectiveness:

1 year: (1.0+0.04) x (2,000 lbs/ton) x (365 days/yr) x (1 yr) = 759,200 lbs/yr.

10 years: (1.0+0.04) x (2,000 lbs/ton) x (365 days/yr) x (10 yrs) = 7,592,000 lbs/10 yrs.

20 years: (1.0+0.04) x (2000 lbs/ton) x (365 days/yr) x (20 yrs) = 15,184,000 lbs/20 yrs.

Capital costs: \$200,000/ x 244 ULESL locomotives = \$48,800,000.

Cost-effectiveness = \$(48,800,000/7,592,000) to \$(48,800,000/15,184,000)

= \$3.21/lb to \$6.43/lb or (\$3-7/lb)

PRELIMINARY DRAFT

Repower 244 ULESL switch locomotives, that had been retrofitted with DPF and SCR, with new Tier 4 nonroad engines

(Emissions Reductions beyond ULESL and DPF/SCR Retrofit)

Emission Reduction(TPD)	NOx	PM
Statewide	0.60	0.01
South Coast	0.35	0.007
Rest of State	0.25	0.005

NOx:

NOx Baseline Emissions – 1.3 g/bhp-hr x 20.8 = 27 grams/gallon.

244 UP and BNSF ULESLs Retrofitted with SCR (20% Diesel Fuel Reduction)

40,000 gallons/yr x 27 grams/gallon = 1,080,000 g/yr/454 g/lb=2,378.85 lbs/yr/2,000 lbs/ton=1.1894 tons/yr/365 days/yr=0.003258 tons/day NOx x 244 ULESLs retrofitted with SCR =

0.795 tons/day NOx controlled.

NOx Control Emissions – 0.3 g/bhp-hr x 20.8 = 6.24 grams/gallon.

244 UP and BNSF ULESLs Tier 4 Nonroad Engines (20% Diesel Fuel Reduction)

40,000 gallons/yr x 6.24 grams/gallon = 249,600 grams/yr/454 g/lb=549.78 lbs/yr/2,000 lbs/ton=0.2749 tons/yr/365 days/yr=0.000753 tons/day NOx x 244 ULESLs with Tier 4 Nonroad engines = 0.18376 tons/day NOx baseline emissions or

0.184 tons/day NOx control emissions.

NOx baseline emissions (0.795 tons/day) – NOx control emissions (0.184 tons/day) =

0.61 tons/day NOx reduced.

PM:

PM Baseline Emissions – 0.03 g/bhp-hr x 20.8 = 0.624 grams/gallon.

244 UP and BNSF ULESLs Retrofitted with DPFs (20% Diesel Fuel Reduction)

40,000 gallons/yr x 0.624 grams/gallon = 24,960 g/yr/454 g/lb=54.98 lbs/yr/2,000 lbs/ton=0.0275 tons/yr/365 days/yr=0.0000753 tons/day PM x 244 ULESLs retrofitted with DPFs =

0.018 tons/day NOx control emissions

PM Control Emissions – 0.01 g/bhp-hr x 20.8 = 0.208 grams/gallon.

244 UP and BNSF ULESLs with Tier 4 Nonroad Engines (20% Diesel Fuel Reduction)

40,000 gallons/year x 0.208 grams/gallon = 8,320 grams/yr/454 g/lb=18.33 lbs/yr/2,000 lbs/ton=0.0092 tons/yr/365 days/yr=0.000025 tons/day PM x 244 ULESLs with Tier 4 Nonroad Engines =

0.006 tons/day PM baseline emissions.

PM baseline emissions (0.018 tons/day) – PM control emissions (0.006 tons/day) = 0.012 tons/day PM reduced or 0.01 tons/day PM reduced.

Cost-effectiveness:

1 year: (0.61+0.01) x (2,000 lbs/ton) x (365 days/yr) x (1 yr) = 452,600 lbs/yr.

10 years: (1.0+0.04) x (2,000 lbs/ton) x (365 days/yr) x (10 yrs) = 4,526,000 lbs/10 yrs.

20 years: (1.0+0.04) x (2000 lbs/ton) x (365 days/yr) x (20 yrs) = 9,052,000 lbs/20 yrs.

Capital costs: \$200,000/ x 244 ULESL locomotives = \$48,800,000.

Cost-effectiveness = \$(48,800,000/4,526,000) to \$(48,800,000/9,052,000)

= \$10.78/lb to \$5.39/lb or (\$5.50-11/lb)

PRELIMINARY DRAFT

Remanufacture 152 older UP and BNSF switch locomotives to meet the U.S. EPA Tier 0 Plus emission standards

Emission Reduction(TPD)	NOx	PM
Statewide	2.2	0.22
South Coast	0.8	0.09
Rest of State	1.4	0.13

NOx:

NOx Baseline Emissions – 17.4 g/bhp-hr x 20.8 = 362 grams/gallon.

103 pre-Tier 0 UP and BNSF Switch Locomotives

50,000 gallons/yr x 362 grams/gallon=18,100,000 grams/yr/454 g/lb=39,867.84 lbs/yr/2,000 lbs/ton=19.93 tons/yr/365 days/yr=0.0546 tons/day NOx x 103 pre-Tier 0 switchers = 5.625 tons/day NOx emissions.

NOx Baseline Emissions – 14.0 g/bhp-hr x 20.8 = 291 grams/gallon.

49 Tier 0 UP and BNSF Switch Locomotives

50,000 gallons/yr x 291 grams/gallon=14,550,000 grams/yr/454 g/lb=32,048.46 lbs/yr/2,000 lbs/ton=16.0 tons/yr/365 days/yr=0.0439 tons/day NOx x 49 Tier 0 switch locomotives = 2.15 tons/day NOx emissions.

103 pre-Tier 0 UP/BNSF switch locomotives + 49 Tier 0 UP/BNSF switch locomotives= (5.625 tons/day) + (2.15 tons/day) = 7.776 tons/day NOx or 7.8 tons/day.

NOx baseline emissions for 152 older UP/BNSF switchers= 7.8 tons/day.

NOx Control Emissions – 11.8 g/bhp-hr x 20.8 = 245 grams/gallon.

152 Tier 0 Plus UP and BNSF Switch Locomotives

50,000 gallons/year x 245 grams/gallon = 12,250,000 grams/yr/454 g/lb=26,982.4 lbs/yr/2,000 lbs/ton=13.49 tons/yr/365 days/yr=0.03696 tons/day NOx x 152 Tier 0 Plus switch locomotives = 5.618 tons/day **NOx controlled emissions or 5.6 tons/day NOx controlled.**

NOx baseline emissions (7.776 tons/day) – NOx control emissions (5.618 tons/day) = 2.15776 tons/day NOx reduced or 2.16 or **2.2 tons/day NOx reduced.**

PM:

PM Baseline Emissions – 0.72 g/bhp-hr x 20.8 = 15 grams/gallon.

152 pre-Tier 0 and Tier 0 UP and BNSF Switch Locomotives

50,000 gallons/yr x 15 grams/gallon=750,000 grams/yr/454 g/lb=1,651.98 lbs/yr/2,000 lbs/ton=0.826 tons/yr/365 days/yr=0.002263 tons/day PM x 152 pre-Tier and Tier 0 switchers = **0.344 tons/day PM baseline emissions.**

PM Control Emissions – 0.26 g/bhp-hr x 20.8 = 5.408 or 5.4 grams/gallon.

152 Tier 0 Plus UP and BNSF Switch Locomotives

50,000 gallons/year x 5.4 grams/gallon = 270,000 grams/yr/454 g/lb=594.7 lbs/yr/2,000 lbs/ton=0.297 tons/yr/365 days/yr=0.0008147 tons/day PM x 152 Tier 0 Plus = 0.12383 tons/day PM controlled emissions or **0.12 tons/day PM controlled.**

PM baseline emissions (0.344 tons/day) – PM control emissions (0.12 tons/day) = 0.224 tons/day PM reduced or **0.22 tons/day PM reduced.**

Cost-effectiveness:

1 year: (2.2+0.22) x (2,000 lbs/ton) x (365 days/yr) x (1 yr) = 1,766,600 lbs/yr.

10 years: (2.2+0.22) x (2,000 lbs/ton) x (365 days/yr) x (10 yrs) = 17,666,000 lbs/10 yrs.

20 years: (2.0+0.2) x (2,000 lbs/ton) x (365 days/yr) x (20 yrs) = 35,332,000 lbs/20 yrs.

Capital costs: \$250,000/ x 152 locos = \$38,000,000.

Cost-effectiveness = \$(38,000,000/35,332,000) to \$(38,000,000/17,666,000) = \$1.08/lb to \$2.15/lb or (\$1-2/lb)

PRELIMINARY DRAFT

Calculations of Tier 2b, Tier 4 , and Tier 0 Plus Locomotive NOx and PM Emissions:

(Source: EPA Fact Sheet – Emission Factors for Locomotives – EPA420-F-97-051 – December 1997)
<http://www.epa.gov/otaq/regs/nonroad/locomotv/frm/42097051.pdf>

Medium Horsepower Locomotive Emission Factors (EF)

(g/bhp-hr)	NOx EF	PM EF
Pre Tier 0	13.5	0.60
Tier 0	9.5	0.60
Tier 0+	8.0	0.22
Tier 2	4.0	0.10
Tier 4	1.3	0.03

Conversion Factors

bhp-hr/gallon
20.8

tons/g
1.10E-06

see earlier notes; lower in all cases.

UP/BNSF/Passenger Medium Horsepower Locomotive Fleet Composition

Medium HP	# Locos	Pre-Tier 0
Statewide	400	400
South Coast	150	150
Rest of State	250	250

Other Key Assumptions:

All medium horsepower locomotives are assumed to consume 100,000 gallons of fuel per year.

PRELIMINARY DRAFT

Repower of 400 older Freight and Passenger MHP locomotives with new LEL engines:

<u>Emission Reduction(TPD)</u>	<u>NOx</u>	<u>PM</u>
Statewide	23	1.25
South Coast	8.6	0.47
Rest of State	14.4	0.78

NOx:

NOx Baseline Emissions – 13.5 g/bhp-hr x 20.8 = 281 grams/gallon.

360 UP/BNSF/Passenger Pre-Tier 0 MHP Locomotives

100,000 gallons/yr x 281 grams/gallon=28,100,000 grams/yr/454 g/lb=61,894.27 lbs/yr/2,000 lbs/ton=30.95 tons/yr/365 days/yr=0.08478 tons/day NOx x 360 pre-Tier 0 MHP locomotives = 30.52 tons/day or **30.5 tons/day** NOx baseline emissions.

NOx Baseline Emissions – 9.5 g/bhp-hr x 20.8 = 198 grams/gallon.

40 UP/BNSF/Passenger Tier 0 MHP Locomotives

100,000 gallons/yr x 198 grams/gallon=19,800,000 grams/yr/454 g/lb=43,612.33 lbs/yr/2,000 lbs/ton=21.81 tons/yr/365 days/yr=0.0597 tons/day NOx x 40 Tier 0 MHP locomotives = 2.3897 tons/day or **2.4 tons/day** NOx baseline emissions.

360 pre-Tier 0 UP/BNSF/Passenger MHP locomotives + 40 Tier 0 UP/BNSF/Passenger MHP locomotives= (30.5 tons/day) + (2.4 tons/day) = **32.9 tons/day NOx baseline emissions for 400 older UP/BNSF/Passenger MHP Locomotives.**

NOx Control Emissions – 4.0 g/bhp-hr x 20.8 = 83 grams/gallon.

400 UP/BNSF/Passenger MHP LEL Engine Repower Locomotives

100,000 gallons/year x 83 grams/gallon = 8,300,000 grams/yr/454 g/lb=18,281.94 lbs/yr/2,000 lbs/ton=9.14 tons/yr/365 days/yr=0.025 tons/day NOx x 400 MHP LEL Engine Repower Locomotives = 10.0175 tons/day **NOx controlled emissions or 10.0 tons/day NOx controlled.**

NOx baseline emissions (32.9 tons/day) – NOx control emissions (10.0 tons/day) = **22.9 or 23 tons/day NOx reduced.**

PM:

PM Baseline Emissions – 0.6 g/bhp-hr x 20.8 = 12.5 grams/gallon.

400 pre-Tier 0 and Tier 0 UP/BNSF/Passenger MHP Locomotives

100,000 gallons/yr x 12.5 grams/gallon=1,250,000 grams/yr/454 g/lb=2,753.3 lbs/yr/2,000 lbs/ton=1.377 tons/yr/365 days/yr=0.00377 tons/day PM x 400 pre-Tier and Tier 0 MHP Locomotives = **1.509 tons/day PM baseline emissions.**

PM Control Emissions – 0.1 g/bhp-hr x 20.8 = 2 grams/gallon.

400 UP/BNSF/Passenger MHP Locomotives with LEL Engine Repowers

100,000 gallons/year x 2 grams/gallon = 200,000 grams/yr/454 g/lb=440.53 lbs/yr/2,000 lbs/ton=0.22 tons/yr/365 days/yr=0.0006 tons/day PM x 400 MHP Locomotives with LEL Engine Repowers = **0.241 tons/day PM controlled.**

PM baseline emissions (1.51 tons/day) – PM control emissions (0.24 tons/day) = 1.27 tons/day PM reduced or **1.25 tons/day PM reduced.**

Cost-effectiveness:

1 year: (23+1.25) x (2,000 lbs/ton) x (365 days/yr) x (1 yr) = 17,702,500 lbs/yr.

10 years: (23+1.25) x (2,000 lbs/ton) x (365 days/yr) x (10 yrs) = 177,025,000 lbs/10 yrs.

20 years: (23+1.25) x (2,000lbs/ton) x (365 days/yr) x (20 yrs) = 354,050,000 lbs/20 yrs.

Capital costs: \$1,000,000/ x 400 MHP LEL locomotives = \$400,000,000

Cost-effectiveness = \$(400,000,000/354,050,000 lbs/20 yrs) to \$(400,000,000/177,025,000 lbs/10 yrs)

= \$1.13/lb to \$2.26/lb or **(\$1-2/lb)**

PRELIMINARY DRAFT

Replace up to 200 of the 400 older MHP locomotives with new MHP gen-set locomotives (*Complement and Alternative to MHP LEL Engine Repowers*)

<u>Emission Reduction(TPD)</u>	<u>NOx</u>	<u>PM</u>
Statewide	13.3	0.63
South Coast	6.65	0.315
Rest of State	6.65	0.315

NOx:

NOx Baseline Emissions – $13.5 \text{ g/bhp-hr} \times 20.8 = 281 \text{ grams/gallon}$.

200 UP/BNSF/Passenger Pre-Tier 0 MHP Locomotives

$100,000 \text{ gallons/yr} \times 281 \text{ grams/gallon} = 28,100,000 \text{ grams/yr} / 454 \text{ g/lb} = 61,894.27 \text{ lbs/yr} / 2,000 \text{ lbs/ton} = 30.95 \text{ tons/yr} / 365 \text{ days/yr} = 0.084786676 \text{ tons/day}$ NOx x 200 pre-Tier 0 MHP locomotives = **16.957 tons/day** or **17 tons/day** NOx baseline emissions.

NOx Control Emissions – $3.0 \text{ g/bhp-hr} \times 20.8 = 62 \text{ grams/gallon}$.

200 UP/BNSF/ MHP Gen-Set Replacement Locomotives

$100,000 \text{ gallons/year} \times 62 \text{ grams/gallon} = 6,200,000 \text{ grams/yr} / 454 \text{ g/lb} = 13,656.4 \text{ lbs/yr} / 2,000 \text{ lbs/ton} = 6.83 \text{ tons/yr} / 365 \text{ days/yr} = 0.0187 \text{ tons/day}$ NOx x 200 MHP Gen-Set Locomotives = **3.7415 tons/day** or **3.74 tons/day NOx controlled emissions**.

NOx baseline emissions (17 tons/day) – NOx control emissions (3.74 tons/day) = **13.26 or 13.3 tons/day NOx reduced**.

PM:

PM Baseline Emissions – $0.6 \text{ g/bhp-hr} \times 20.8 = 12.5 \text{ grams/gallon}$.

200 pre-Tier 0 and Tier 0 UP/BNSF/Passenger MHP Locomotives

$100,000 \text{ gallons/yr} \times 12.5 \text{ grams/gallon} = 1,250,000 \text{ grams/yr} / 454 \text{ g/lb} = 2,753.3 \text{ lbs/yr} / 2,000 \text{ lbs/ton} = 1.377 \text{ tons/yr} / 365 \text{ days/yr} = 0.00377 \text{ tons/day}$ PM x 200 pre-Tier and Tier 0 MHP Locomotives = **0.754 tons/day PM baseline emissions**.

PM Control Emissions – $0.1 \text{ g/bhp-hr} \times 20.8 = 2 \text{ grams/gallon}$.

200 UP/BNSF/Passenger MHP Locomotives with Gen-Set Replacement Locomotives

$100,000 \text{ gallons/year} \times 2 \text{ grams/gallon} = 200,000 \text{ grams/yr} / 454 \text{ g/lb} = 440.53 \text{ lbs/yr} / 2,000 \text{ lbs/ton} = 0.22 \text{ tons/yr} / 365 \text{ days/yr} = 0.0006 \text{ tons/day}$ PM x 200 MHP Gen-Set Locomotives = **0.12 tons/day PM controlled**.

PM baseline emissions (0.754 tons/day) – PM control emissions (0.12 tons/day) = **0.634 tons/day PM reduced** or **0.63 tons/day PM reduced**.

Cost-effectiveness:

1 year: $(13.3+0.63) \times (2,000 \text{ lbs/ton}) \times (365 \text{ days/yr}) \times (1 \text{ yr}) = 10,168,900 \text{ lbs/yr}$.

10 years: $(13.3+0.63) \times (2,000 \text{ lbs/ton}) \times (365 \text{ days/yr}) \times (10 \text{ yrs}) = 101,689,000 \text{ lbs/10 yrs}$.

20 years: $(13.3+0.63) \times (2,000 \text{ lbs/ton}) \times (365 \text{ days/yr}) \times (20 \text{ yrs}) = 203,378,000 \text{ lbs/20 yrs}$.

Capital costs: $\$2,000,000 / 200 \text{ MHP LEL locomotives} = \$400,000,000$

Cost-effectiveness = $\$(400,000,000 / 203,378,000 \text{ lbs/20 yrs})$ to $\$(400,000,000 / 101,689,000 \text{ lbs/10 yrs})$
= $\$1.97/\text{lb}$ to $\$3.93/\text{lb}$ or **~~\\$2-4/lb~~**

3-5% fuel penalty

PRELIMINARY DRAFT

Remanufacture 400 older MHP locomotives to meet U.S. EPA Tier 0 Plus Emission Standards (Less Expensive Alternative to LEL and Gen-Set Options)

assumes no fuel penalty in going from pre-Tier 0 to Tier 0 + not a good assumption

Emission Reduction(TPD)	NOx	PM
Statewide	13	1.0
South Coast	4.9	0.37
Rest of State	8.1	0.63

NOx:

NOx Baseline Emissions – 13.5 g/bhp-hr x 20.8 = 281 grams/gallon.

360 UP/BNSF/Passenger Pre-Tier 0 MHP Locomotives

100,000 gallons/yr x 281 grams/gallon=28,100,000 grams/yr/454 g/lb=61,894.27 lbs/yr/2,000 lbs/ton=30.95 tons/yr/365 days/yr=0.08478 tons/day NOx x 360 pre-Tier 0 MHP locomotives = 30.52 tons/day or **30.5 tons/day** NOx baseline emissions.

NOx Baseline Emissions – 9.5 g/bhp-hr x 20.8 = 198 grams/gallon.

40 UP/BNSF/Passenger Tier 0 MHP Locomotives

100,000 gallons/yr x 198 grams/gallon=19,800,000 grams/yr/454 g/lb=43,612.33 lbs/yr/2,000 lbs/ton=21.81 tons/yr/365 days/yr=0.0597 tons/day NOx x 40 Tier 0 MHP locomotives = 2.3897 tons/day or **2.4 tons/day** NOx baseline emissions.

360 pre-Tier 0 UP/BNSF/Passenger MHP locomotives + 40 Tier 0 UP/BNSF/Passenger MHP locomotives = (30.5 tons/day) + (2.4 tons/day) = 32.9 tons/day

NOx baseline emissions for 400 older UP/BNSF/Passenger MHP Locomotives = 32.9 tons/day.

NOx Control Emissions – 8.0 g/bhp-hr x 20.8 = 166 grams/gallon.

400 UP/BNSF/Passenger MHP Locomotives Remanufactured to Tier 0 Plus NOx

100,000 gallons/year x 166 grams/gallon = 16,600,000 grams/yr/454 g/lb=36,563.87 lbs/yr/2,000 lbs/ton=18.28 tons/yr/365 days/yr=0.05 tons/day NOx x 400 MHP Locomotives Remanufactured to Tier 0 Plus NOx = 20.035 tons/day or **20.0 tons/day NOx controlled emissions.**

NOx baseline emissions (32.9 tons/day) – NOx control emissions (20.0 tons/day) =

12.9 or 13 tons/day NOx reduced.

PM:

PM Baseline Emissions – 0.6 g/bhp-hr x 20.8 = 12.5 grams/gallon.

400 pre-Tier 0 and Tier 0 UP/BNSF/Passenger MHP Locomotives

100,000 gallons/yr x 12.5 grams/gallon=1,250,000 grams/yr/454 g/lb=2,753.3 lbs/yr/2,000 lbs/ton=1.377 tons/yr/365 days/yr=0.00377 tons/day PM x 400 pre-Tier and Tier 0 MHP Locomotives = **1.509 or 1.51 tons/day PM baseline emissions.**

PM Control Emissions – 0.22 g/bhp-hr x 20.8 = 4.576 or 4.6 grams/gallon.

400 UP/BNSF/Passenger MHP Locomotives Remanufactured to Tier 0 Plus PM Standards

100,000 gallons/year x 4.6 grams/gallon = 460,000 grams/yr/454 g/lb=1,013.21 lbs/yr/2,000 lbs/ton=0.5066 tons/yr/365 days/yr=0.001388 tons/day PM x 400 MHP Locomotives Remanufactured to Tier 0 Plus Standards = **0.55518 tons per day or 0.555 tons per day PM controlled.**

PM baseline emissions (1.51 tons/day) – PM control emissions (0.555 tons/day) = 0.955 or 0.96 tons/day PM

reduced or **1.0 tons/day PM reduced.**

Cost-effectiveness:

1 year: (13+1.0) x (2,000 lbs/ton) x (365 days/yr) x (1 yr) = 10,220,000 lbs/yr.

10 years: (13+1.0) x (2,000 lbs/ton) x (365 days/yr) x (10 yrs) = 102,200,000 lbs/10 yrs.

20 years: (13+1.0) x (2,000 lbs/ton) x (365 days/yr) x (20 yrs) = 204,400,000 lbs/20 yrs.

Capital costs: \$250,000/ x 400 MHP locomotives = \$100,000,000

Cost-effectiveness = \$(100,000,000/204,400,000 lbs/20 yrs) to \$(100,000,000/102,200,000 lbs/10 yrs)

= \$0.49/lb to \$0.98/lb or **(\$0.5-1/lb)**

PRELIMINARY DRAFT

Retrofit 400 LEL or gen-set MHP locomotives with DPF and SCR

<u>Emission Reduction(TPD)</u>	<u>NOx</u>	<u>PM</u>
Statewide	6.8	0.18
South Coast	2.55	0.07
Rest of State	4.25	0.11

NOx:

NOx Baseline Emissions – $4.0 \text{ g/bhp-hr} \times 20.8 = 83.2 \text{ grams/gallon}$.

400 UP/BNSF/Passenger MHP LEL Engine Repower Locomotives

$100,000 \text{ gallons/year} \times 83.2 \text{ grams/gallon} = 8,320,000 \text{ grams/yr}/454 \text{ g/lb} = 18,325.99 \text{ lbs/yr}/2,000 \text{ lbs/ton} = 9.163 \text{ tons/yr}/365 \text{ days/yr} = 0.0251 \text{ tons/day NOx} \times 400 \text{ MHP LEL Engine Repower Locomotives} = 10.042 \text{ tons/day}$ or **10.042 tons/day NOx baseline emissions.**

NOx Control Emissions – $1.3 \text{ g/bhp-hr} \times 20.8 = 27 \text{ grams/gallon}$.

400 UP/BNSF/Passenger MHP LEL Engine Repower Locomotives Retrofitted with SCR

$100,000 \text{ gallons/yr} \times 27 \text{ grams/gallon} = 2,700,000 \text{ grams/yr}/454 \text{ g/lb} = 5,947.17 \text{ lbs/yr}/2,000 \text{ lbs/ton} = 2.97 \text{ tons/yr}/365 \text{ days/yr} = 0.0081468 \text{ tons/day NOx} \times 400 \text{ MHP LEL Engine Repowered Locomotives with SCR} = 3.2587 \text{ tons/day}$ or **3.26 tons/day NOx control emissions.**

NOx baseline emissions (10.042 tons/day) – NOx control emissions (3.2583 tons/day) = 6.784 or **6.8 tons/day NOx reduced.**

PM:

PM Baseline Emissions – $0.1 \text{ g/bhp-hr} \times 20.8 = 2.08 \text{ grams/gallon}$.

400 UP/BNSF/Passenger MHP Locomotives with LEL Engine Repowers

$100,000 \text{ gallons/year} \times 2.08 \text{ grams/gallon} = 208,000 \text{ grams/yr}/454 \text{ g/lb} = 458.15 \text{ lbs/yr}/2,000 \text{ lbs/ton} = 0.229 \text{ tons/yr}/365 \text{ days/yr} = 0.0006276 \text{ tons/day PM} \times 400 \text{ MHP Locomotives with LEL Engine Repowers} = 0.251 \text{ tons/day PM baseline emissions.}$

PM Control Emissions – $0.03 \text{ g/bhp-hr} \times 20.8 = 0.624 \text{ grams/gallon}$.

400 UP/BNSF/Passenger MHP Locomotives with LEL Engine Repowers Retrofitted with DPFs

$100,000 \text{ gallons/yr} \times 0.624 \text{ grams/gallon} = 62,400 \text{ grams/yr}/454 \text{ g/lb} = 137.45 \text{ lbs/yr}/2,000 \text{ lbs/ton} = 0.06872 \text{ tons/yr}/365 \text{ days/yr} = 0.000188281 \text{ tons/day PM} \times 400 \text{ MHP Locomotives with LEL Engine Repowers and Retrofitted with DPFs} = 0.0753 \text{ tons per day PM controlled emissions.}$

PM baseline emissions (0.251 tons/day) – PM control emissions (0.0753 tons/day) = 0.1757 tons/day PM reduced or **0.18 tons/day PM reduced.**

Cost-effectiveness:

1 year: $(6.8+0.18) \times (2,000 \text{ lbs/ton}) \times (365 \text{ days/yr}) \times (1 \text{ yr}) = 5,095,400 \text{ lbs/yr}$.

10 years: $(6.8+1.25) \times (2,000 \text{ lbs/ton}) \times (365 \text{ days/yr}) \times (10 \text{ yrs}) = 50,954,000 \text{ lbs/10 yrs}$.

20 years: $(6.8+1.25) \times (2,000 \text{ lbs/ton}) \times (365 \text{ days/yr}) \times (20 \text{ yrs}) = 101,908,000 \text{ lbs/20 yrs}$.

Capital costs: $\$500,000 / 400 \text{ MHP LEL locomotives retrofitted with SCR and DPF} = \$200,000,000$

Cost-effectiveness = $\$(200,000,000/101,908,000 \text{ lbs/20 yrs})$ to $\$(200,000,000/50,954,000 \text{ lbs/10 yrs})$

= $\$1.96/\text{lb}$ to $\$3.93/\text{lb}$ or **(\$2-4/lb)**

Add option or replace with T4-nonroad gensets @ 0.3/201

PRELIMINARY DRAFT

Line Haul Locomotive Emission Factors (EF)

<i>(g/bhp-hr)</i>	NOx EF	PM EF
Tier 2	5.5	0.20
Tier 4	1.3	0.03

← Tier 3?

Conversion Factors

<i>bhp-hr/gallon</i>
20.8

<i>tons/g</i>
1.10E-06

Projected UP and BNSF Interstate Line Haul Locomotive Fleet Composition in 2020

<i>Interstate Line Hauls</i>	# Locos	Tier 2
Statewide	600	600
South Coast	300	300
Rest of State	300	300

Other Key Assumptions:

All line haul locomotives are assumed to consume 100,000 gallons of fuel per year. This assumes an interstate line haul locomotive consumes up to 500,000 gallons per year, traveling across county (e.g., Chicago to Los Angeles), and only 20 percent of annual consumption is within the state of California.

Assumes UP and BNSF interstate line haul locomotive fleet in California will be a Tier 2 fleet average by 2020. Net emissions reductions would be only difference between a Tier 2 and Tier 4 interstate line haul locomotive emissions (76% NOx and 85% PM).

PRELIMINARY DRAFT

Accelerate UP and BNSF national Tier 4 interstate line haul locomotive fleet with orders for up to 1,500 to ensure 600 operate in California on any given day:

<i>Emission Reduction(TPD)</i>	NOx	PM
Statewide	16	0.64
South Coast	8	0.32
Rest of State	8	0.32

NOx:

NOx Baseline Emissions – 5.5 g/bhp-hr x 20.8 = 114.4 grams/gallon.
600 UP and BNSF Tier 2 Interstate Line Haul Locomotives in 2020
 100,000 gallons/year x 114.4 grams/gallon = 11,440,000 grams/yr/454 g/lb=25,198.24 lbs/yr/2,000 lbs/ton=12.599 tons/yr/365 days/yr=0.034518 tons/day NOx x 600 UP and BNSF Tier 2 Interstate Line Haul Locomotives = 20.71 tons/day **or 20.7 tons/day NOx baseline emissions.**

NOx Control Emissions – 1.3 g/bhp-hr x 20.8 = 27 grams/gallon.
600 UP and BNSF Tier 4 Interstate Line Haul Locomotives in 2020
 100,000 gallons/yr x 27 grams/gallon=2,700,000 grams/yr/454 g/lb=5,947.17 lbs/yr/2,000 lbs/ton=2.97 tons/yr/365 days/yr=0.0081468 tons/day NOx x 600 UP and BNSF Tier 4 Interstate Line Haul Locomotives with SCR = 4.888 tons/day **or 4.9 tons/day NOx controlled emissions.**

NOx baseline emissions (20.7 tons/day) – NOx control emissions (4.9 tons/day) = 15.8 or **16.0 tons/day NOx reduced.**

PM:

PM Baseline Emissions – 0.2 g/bhp-hr x 20.8 = 4.16 grams/gallon.
600 UP and BNSF Tier 2 Interstate Line Haul Locomotives in 2020
 100,000 gallons/year x 4.16 grams/gallon = 416,000 grams/yr/454 g/lb=916.3 lbs/yr/2,000 lbs/ton=0.458 tons/yr/365 days/yr=0.0012552 tons/day PM x 600 UP and BNSF Tier 2 Interstate Line Haul Locomotives in 2020 = **0.753 tons/day PM baseline emissions**

PM Control Emissions – 0.03 g/bhp-hr x 20.8 = 0.624 grams/gallon.
600 UP and BNSF Tier 4 Interstate Line Haul Locomotives in 2020
 100,000 gallons/yr x 0.624 grams/gallon=62,400 grams/yr/454 g/lb=137.45 lbs/yr/2,000 lbs/ton=0.06872 tons/yr/365 days/yr= 0.000188281 tons/day PM x 600 UP and BNSF Tier 4 Interstate Line Haul Locomotives with DPFs = **0.11297 tons or 0.113 per day PM controlled emissions.**

PM baseline emissions (0.753 tons/day) – PM control emissions (0.113 tons/day) = 0.64 or **0.6 tons/day PM reduced.**

Cost-effectiveness:

1 year: (16+0.6) x (2,000 lbs/ton) x (365 days/yr) x (1 yr) = 12,118,000 lbs/yr.
 10 years: (16+0.6) x (2,000 lbs/ton) x (365 days/yr) x (10 yrs) = 121,180,000 lbs/10 yrs.
 20 years: (16+0.6) x (2,000 lbs/ton) x (365 days/yr) x (20 yrs) = 242,360,000 lbs/20 yrs.
 30 years: (16+0.6) x (2,000 lbs/ton) x (365 days/yr) x (30 yrs) = 363,540,000 lbs/30 yrs.
 Capital costs: \$3,000,000/ x 1,500 UP and BNSF Tier 4 National Fleet Interstate Line Haul Locos = \$4,500,000,000 (\$4.5 billion)
 Cost-effectiveness = \$(4,500,000,000/363,540,000 lbs/30 yrs) to \$(4,500,000,000/121,180,000 lbs/10 yrs) = \$12.38/lb to \$37.13/lb or **(\$12-37/lb)**

PRELIMINARY DRAFT

Calculations of Cargo Handling Equipment NOx and PM Emissions and Cost-Effectiveness

(Source: ARB Staff Report – Initial Statement of Reasons for Proposed Rulemaking – Regulation for Mobile Cargo Handling Equipment at Ports and Intermodal Rail Yards – October 2005
 ARB Staff Report – Carl Moyer Program Guidelines – Part IV, Appendices – November 2005
 CALSTART – LNG Yard Hostler Demonstration and Commercialization Project, Final Report - August 2008
 Port of Los Angeles – Electric Truck Demonstration Project Fact Sheet – May 2008
 National Renewable Energy Laboratory – “Using LNG as fuel in Heavy-Duty Tractors” – July, 1999)

LNG Yard Truck

Annual Baseline Emissions:

Yard Truck w/ 2007+ On-road Diesel Engine:

PM Emissions_{Baseline}:
 $[(0.01 \text{ g/bhp-hr} \times 170\text{hp} \times 0.39 \times 3,196 \text{ hr/yr}) \times (1 \text{ ton}/907,200\text{g})] = 0.002 \text{ ton/yr}$

NOx Emissions_{Baseline}:
 $[(0.27 \text{ g/bhp-hr} \times 170\text{hp} \times 0.39 \times 3,196 \text{ hr/yr}) \times (1 \text{ ton}/907,200\text{g})] = 0.06 \text{ ton/yr}$

*Total Annual Baseline Emissions_{PM + NOx} = **0.062 ton/yr***

8 Intermodal Railyards:

PM Emissions₂₀₀₅: 14.80 ton/yr
NOx Emissions₂₀₀₅: 328 ton/yr
342.8 ton/yr

g / (hp-hr) x hp x hr/yr = g/yr

PM Emissions₂₀₁₀: 14.80 ton/yr x 0.36 = 5.3 ton/yr
NOx Emissions₂₀₁₀: 328 ton/yr x 0.51 = 167 ton/yr
172.3 ton/yr

PM Emissions₂₀₁₅: 14.80 ton/yr x 0.24 = 3.6 ton/yr
NOx Emissions₂₀₁₅: 328 ton/yr x 0.30 = 98.4 ton/yr
102 ton/yr

PM Emissions₂₀₂₀: 14.80 ton/yr x 0.12 = 1.78 ton/yr
NOx Emissions₂₀₂₀: 328 ton/yr x 0.09 = 29.5 ton/yr
31.3 ton/yr

Annual Reduced Technology Emissions:

LNG Yard Truck:

PM Emissions_{reduced}:
 N/A

NOx Emissions_{reduced}:
 $[(2.68 \text{ g/bhp-hr} \times 170\text{hp} \times 0.39 \times 3,196 \text{ hr/yr}) \times (1 \text{ ton}/907,200\text{g})] = 0.63 \text{ ton/yr}$

*Total Annual Reduced Technology Emissions_{PM + NOx} = **0.63 ton/yr***

8 Intermodal Railyards

PM Emissions₂₀₀₅: 0 ton/yr
NOx Emissions₂₀₀₅: 202.9 ton/yr

PRELIMINARY DRAFT

*PM Emissions*₂₀₂₀ 0 ton/yr
*NOx Emissions*₂₀₂₀ 14.8 ton/yr

? really?

Annual Surplus Emission Reductions:

Total Annual Baseline Emissions_{PM + NOx} + Total Annual Reduced Technology Emissions_{PM + NOx}
0.062 ton/yr – 0.63 ton/yr = **-0.57 ton/year** (2007+ on-road engine)

Total Annual Baseline Emissions_{PM + NOx} + Total Annual Reduced Technology Emissions_{PM + NOx}
172.3 ton/yr – 202.9 ton/yr = **-30.3 ton/year** (2010 Railyard Emissions)

Total Annual Baseline Emissions_{PM + NOx} + Total Annual Reduced Technology Emissions_{PM + NOx}
101.6 ton/yr – 202.9 ton/yr = **-101.3 ton/year** (2015 Railyard Emissions)

Total Annual Baseline Emissions_{PM + NOx} + Total Annual Reduced Technology Emissions_{PM + NOx}
31.3 ton/yr – 202.9 ton/yr = **-171.6 ton/year** (2020 Railyard Emissions)

Cost Estimates:

LNG Yard Truck: \$120,000
8 Intermodal Railyards: \$120,000 x 322 = **\$38,640,000**

Cost Effectiveness: N/A

Electric Yard Truck:

Annual Baseline Emissions:

Yard Truck w/ 2007+ On-road Diesel Engine:

*PM Emissions*_{Baseline}:
[(0.01 g/bhp-hr x 170hp x 0.39 x 3,196 hr/yr) x (1 ton/907,200g)] = 0.002 ton/yr

*NOx Emissions*_{Baseline}:
[(0.27 g/bhp-hr x 170hp x 0.39 x 3,196 hr/yr) x (1 ton/907,200g)] = 0.06 ton/yr

*Total Annual Baseline Emissions*_{PM + NOx} = **0.062 ton/yr**

8 Intermodal Railyards:

*PM Emissions*₂₀₁₀: 14.80 ton/yr x 0.36 = 5.3 ton/yr
*NOx Emissions*₂₀₁₀: 328 ton/yr x 0.51 = 167 ton/yr
172.3 ton/yr

*PM Emissions*₂₀₁₅: 14.80 ton/yr x 0.24 = 3.6 ton/yr
*NOx Emissions*₂₀₁₅: 328 ton/yr x 0.30 = 98.4 ton/yr
102 ton/yr

*PM Emissions*₂₀₂₀: 14.80 ton/yr x 0.12 = 1.78 ton/yr
*NOx Emissions*₂₀₂₀: 328 ton/yr x 0.09 = 29.5 ton/yr
31.3 ton/yr

Annual Reduced Technology Emissions:

Electric Yard Truck:
*PM Emissions*_{reduced}:

PRELIMINARY DRAFT

N/A

NOx Emissions_{reduced}:
N/A

Total Annual Reduced Technology Emissions_{PM + NOx} = 0 ton/yr

8 Intermodal Railyards

PM Emissions₂₀₁₀: 0 ton/yr
NOx Emissions₂₀₁₀: 0 ton/yr

PM Emissions₂₀₁₅: 0 ton/yr
NOx Emissions₂₀₁₅: 0 ton/yr

PM Emissions₂₀₂₀: 0 ton/yr
NOx Emissions₂₀₂₀: 0 ton/yr

Annual Surplus Emission Reductions:

Total Annual Baseline Emissions_{PM + NOx} - Total Annual Reduced Technology Emissions_{PM + NOx}
0.062 ton/yr - 0 ton/yr = 0.062 ton year (2007+on-road engine)

Total Annual Baseline Emissions_{PM + NOx} - Total Annual Reduced Technology Emissions_{PM + NOx}
172.3 ton/yr - 0 ton/yr = 172.3 ton/year (2010 Railyard Emissions)

Total Annual Baseline Emissions_{PM + NOx} - Total Annual Reduced Technology Emissions_{PM + NOx}
101.6 ton/yr - 0 ton/yr = 101.6 ton/year (2015 Railyard Emissions)

Total Annual Baseline Emissions_{PM + NOx} - Total Annual Reduced Technology Emissions_{PM + NOx}
31.3 ton/yr - 0 ton/yr = 31.3 ton/year (2020 Railyard Emissions)

Emission Benefit over 8 years:

(0.062 ton/yr x 8 years) x 2,000 lbs/ton = 992 lbs (2007+on-road engine)

(172.3 tons/yr x 8 years) x 2,000 lbs/ton = 2,756,800 lbs (8 Intermodal Railyards₂₀₁₀ Emissions)

(101.6 tons/yr x 8 years) x 2,000 lbs/ton = 1,625,600 lbs (8 Intermodal Railyards₂₀₁₅ Emissions)

(31.3 tons/yr x 8 years) x 2,000 lbs/ton = 500,800 lbs (8 Intermodal Railyards₂₀₂₀ Emissions)

Cost Estimates:

Electric Yard Truck: \$208,700

8 Intermodal Railyards: \$208,700 x 322 = \$67,201,400

Cost Effectiveness:

(\$208,700 ÷ 992 lbs) = \$210/lb (2007+on-road engine)

(\$67,201,400 ÷ 2,756,800 lbs) = \$24.38/lb (8 Intermodal Railyards₂₀₁₀ Emissions)

(\$67,201,400 ÷ 1,625,600 lbs) = \$41.34/lb (8 Intermodal Railyards₂₀₁₅ Emissions)

(\$67,201,400 ÷ 500,800 lbs) = \$134.19/lb (8 Intermodal Railyards₂₀₂₀ Emissions)

Energy Storage Systems:

Annual Baseline Emissions:

Should add a footnote about the good people of AZ & NV taking one for the team----

PRELIMINARY DRAFT

RTG Crane w/ Tier 4 Off-road Diesel Engine:

PM Emissions_{Baseline}:
 $[(0.01 \text{ g/bhp-hr} \times 300\text{hp} \times 0.43 \times 4,380 \text{ hr/yr}) \times (1 \text{ ton}/907,200\text{g})] = 0.006 \text{ ton/yr}$

NOx Emissions_{Baseline}:
 $[(0.27 \text{ g/bhp-hr} \times 300\text{hp} \times 0.43 \times 4,380 \text{ hr/yr}) \times (1 \text{ ton}/907,200\text{g})] = 0.168 \text{ ton/yr}$

Total Annual Baseline Emissions_{PM + NOx} = **0.174 ton/yr**

8 Intermodal Railyards

PM Emissions₂₀₀₅: 4.95 ton/yr
NOx Emissions₂₀₀₅: 147.3 ton/yr
152.5 ton/yr

PM Emissions₂₀₁₀: 4.95 ton/yr x 0.58 = 2.9 ton/yr
NOx Emissions₂₀₁₀: 147.3 ton/yr x 0.91 = 134 ton/yr
136.9 ton/yr

PM Emissions₂₀₁₅: 4.95 ton/yr x 0.43 = 2.1 ton/yr
NOx Emissions₂₀₁₅: 147.3 ton/yr x 0.79 = 116.4 ton/yr
118.5 ton/yr

PM Emissions₂₀₂₀: 4.95 ton/yr x 0.43 = 1.45 ton/yr
NOx Emissions₂₀₂₀: 147.3 ton/yr x 0.79 = 100.16 ton/yr
101.6 ton/yr

Annual Reduced Technology Emissions:

Energy Storage System:
PM Emissions_{reduced}:
0.006 ton/yr x 0.25 = 0.0045 ton/yr

NOx Emissions_{reduced}:
0.168 ton/yr x 0.25 = 0.126 ton/yr

Total Annual Reduced Technology Emissions_{PM + NOx} = **0.131 ton/yr**

8 Intermodal Railyards

PM Emissions₂₀₁₀: 2.9 ton/yr x 0.75 = 2.2 ton/yr
NOx Emissions₂₀₁₀: 134 ton/yr x 0.75 = 100.5 ton/yr
102.7 ton/yr

PM Emissions₂₀₁₅: 2.1 ton/yr x 0.75 = 1.6 ton/yr
NOx Emissions₂₀₁₅: 116.4 ton/yr x 0.75 = 87.3 ton/yr
88.9 ton/yr

PM Emissions₂₀₂₀: 1.45 ton/yr x 0.75 = 1.08 ton/yr
NOx Emissions₂₀₂₀: 101.6 ton/yr x 0.75 = 76.2 ton/yr
77.3 ton/yr

Annual Surplus Emission:

Total Annual Baseline Emissions_{PM + NOx} - *Total Annual Reduced Technology Emissions_{PM + NOx}* =

PRELIMINARY DRAFT

Cost-Effectiveness

DPM reduction from the UP Roseville maintenance facility = 1 ton/year (about 0.8 tpy)

NOx reduction (a factor of 20 from DPM reduction) = 20 ton/year

Capital cost = \$25,000,000

Cost-effectiveness (20 years) = (cost)/(emission reductions)
= (\$25,000,000)/[(1+20)ton/yr x 2000lb/ton x 20 years]

= \$30/lb in 2008

x — in 2018

today

What about in 5 years,
with all the genset
switchers, and Ty boxes,
etc.

how does this compare to
the Air District study?