



**Maryland**  
Department of  
the Environment

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# Keeping Cars Clean



MWAQC Meeting – Tad Aburn, Air Director, MDE .... September 23, 2020

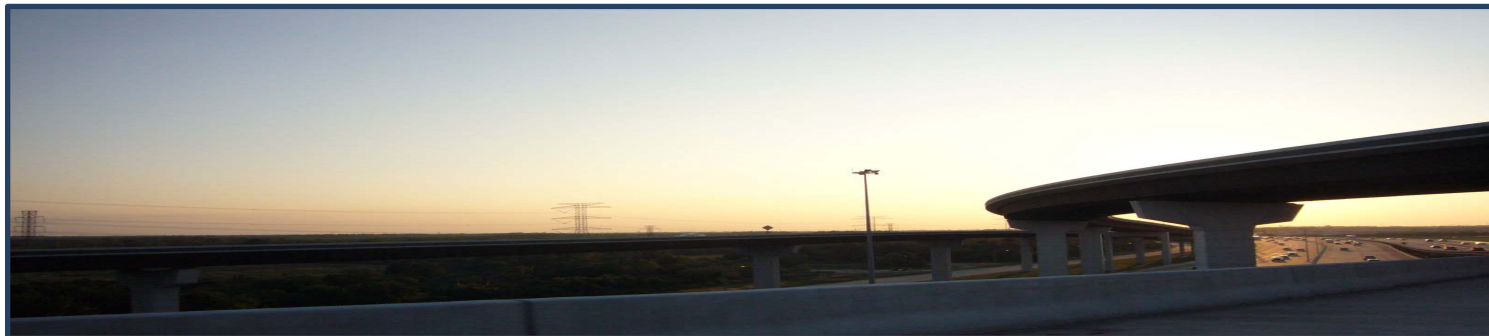
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# Background

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- Cars in the U.S. are amongst the cleanest vehicles in the world
- Cars in the Washington, DC area are amongst the cleanest in the U.S.
- Delay at the Federal level has begun to erode the emission reduction benefits from clean cars
  - EPA has not updated it's policies in 30 years that insure that when the most important part of a cars emission control system (the catalytic converter) is replaced ... that it is replaced by an aftermarket part that actually work
  - Because of this, inferior parts are being installed and emission reduction benefits are being lost





# Purpose of Today's Briefing from Maryland

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- Maryland is hoping that MWAQC will want to work with the Ozone Transport Commission (OTC) and other states to fix this problem
- With no action from EPA, Maryland, the OTC and other states have begun to adopt state and local programs to address this issue



- With the U.S. having one of the cleanest fleets in the world, it seems silly to allow those vehicles to be “fixed” so that the expected emissions reductions are not maintained



# Inaction at the Federal Level

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- There is a long history of efforts by the OTC to push EPA to fix this problem
  - It is a problem best fixed with a federal rule or federal guidance
  - Resolutions, letters and other actions by OTC can be made available by the MWAQC staff
- In 2019 it looked like EPA may take action ... They did not
- New York, Maine, Maryland, New Jersey, Connecticut, Massachusetts, California and Colorado have now either adopted a control program or are in the process of adopting a control program
- OTC has adopted a model rule for Aftermarket Catalytic Converters (AMCC)



## Why is this Important for the DC-MD-VA Ozone Nonattainment Area

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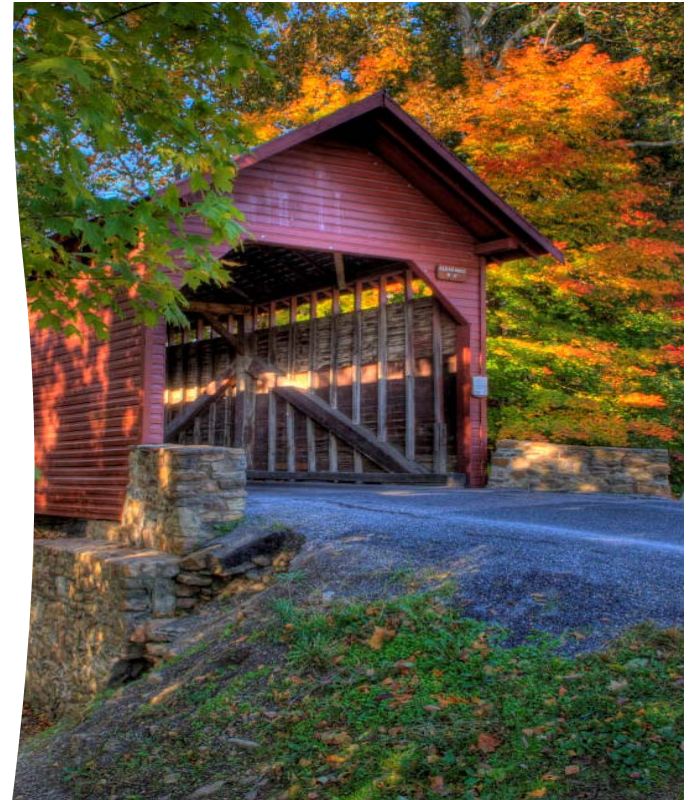
- As Sunil just described, the DC-MD-VA nonattainment area is very, very close to attaining the current ozone standard
  - The Baltimore area is also close
- The science is very clear ...
  - The key to lowering ozone in the Region is reductions of local and regional nitrogen oxide (NO<sub>x</sub>) emissions
- Mobile source emissions are now the dominant source of NO<sub>x</sub> emissions in both Washington and Baltimore
- A regional AMCC program may be the last large NO<sub>x</sub> reduction measure that can be implemented locally
- Estimated NO<sub>x</sub> reductions based upon OTC work
  - MD –2 tons/day
  - DC/MD/VA Nonattainment Area - About 3.5 tons/day
  - OTC Region as a whole - 24 tons/day
  - These are very large reductions in 2020



# The OTC Model Rule

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- The OTC model rule is the basis for Maryland's AMCC regulation
- Borrows heavily from California's regulations adopted because of federal inaction
- Technical details provided to MWAQC TAC ... but the bottom line is that it fixes the problem
- Strongly supported by manufacturers and environmental advocates





# Other AMCC Efforts

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- Maryland's proposed rule was approved by the States Air Quality Control Advisory Council in 2020
  - To be finalized in early 2021
- CA, NY and ME have already adopted AMCC regulations
- CO's regulation was just adopted in 2020
  - Another area that needs local mobile source NOx reductions
- NJ, CT and MA are all working on this issue
- Manufacturers have been a strong partner with MD throughout our regulation development and adoption process
  - Have also been a strong partner with OTC on both the model rule and the effort to push EPA for a national program
- Supported by MECA (the Manufacturers of Emission Controls Association) and Autocare ... MECA is on today's call
- Also well supported by the environmental advocacy community



# Maryland's Experience

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- The regulation and adoption process was not difficult
  - Have a model rule
  - Have vocal support from the manufacturers
  - Supported by environmentalists
  - Have the support (and company) of other states
  - We had no negative comments at our advisory council meeting
  - The increased cost (about \$200) of an effective catalytic converter is offset by an enhanced warranty
- The process pushing for federal action was much more difficult







# Conclusions ... Action

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- Maryland would like to see the AMCC program adopted throughout the DC-MD-VA nonattainment area
  - We hope many MWAQC members will support this
  - We understand that this may take legislation in VA, but this initiative has support from many stakeholders
- Has multiple positive drivers
  - DC-MD-VA area is so close to attainment
  - Significant NOx reductions
  - Cost effective emission reduction strategy with added consumer protections
  - Has vocal support from manufacturers
  - Also being considered or adopted in many other OTC states
- We would urge MWAQC to take action to support region-wide adoption of this critical emission reduction program at this critical time



# One Other Issue

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- In the next month, EPA will be holding a public hearing on a recommendation submitted by the OTC under Section 184C of the Clean Air Act
  - The OTC recommendation was triggered by a petition submitted by Maryland
- It simply asks EPA to require coal-fired power plants in Pennsylvania to use the existing control technologies they have already purchased (up to \$500 Million to purchase and install) on days where ozone is a problem
  - This is actually not required by Pennsylvania or EPA regulations
  - Data shows on some bad ozone days PA units release 30 tons of excess NOx
- Research shows that about 50 to 70 percent of the Washington areas ozone problem originates in states upwind of the region
- Modeling shows potential benefits for the region of up to 5 parts per billion of ozone reductions if OTC recommendation is implemented
- We would simply like MWAQC to submit comments supporting the OTC recommendation when EPA has it's hearing



# Questions

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