



Southwest Clean Air Agency

11815 NE 99th Street, Suite 1294 • Vancouver, WA 98682-2322

(360) 574-3058 • Fax: (360) 576-0925

www.swcleanair.org

May 8, 2007

Docket No. EPA-HQ-OAR-2003-0190

U.S. Environmental Protection Agency

Air and Radiation Docket and Information Center (6102T)

1200 Pennsylvania Avenue NW

Washington, DC 20460

Dear Sir/Madam:

On behalf of the Southwest Clean Air Agency, thank you for the opportunity to comment on the EPA proposal for more stringent emissions standards for Locomotives and Marine Compression-Ignition Engines. My name is Robert D. Elliott. I am the Executive Director of the Southwest Clean Air Agency (SWCCA) located in Vancouver, Washington. Our air quality jurisdiction encompasses Southwest Washington with its largest city of Vancouver, Washington sharing an interstate ozone airshed with Portland, Oregon and also including responsibility for a portion of the Columbia River Gorge National Scenic Area.

The purpose of my testimony is threefold: (1) express support for the Proposed Locomotive and Marine Engine rule; (2) emphasize the importance of expeditious adoption of the rulemaking; and (3) advocate for new rule language that requires Locomotives and Marine Diesel Engines traveling through a federally designated National Scenic Area or Class 1 Area and a Major Metropolitan Area be designated for first application of remanufactured and newly built locomotives and marine diesel engines.

An important need for this rule involves its ability to improve air quality in the Columbia River Gorge National Scenic Area (CRGNSA). It will also benefit the public health of citizens in the adjacent Portland, Oregon and Vancouver, Washington metropolitan area. The Columbia River Gorge is a spectacular river canyon cutting through the only sea-level route in the Cascade Mountain Range. It is 80 miles long and up to 4,000 feet deep with the north canyon walls in Washington State and the south canyon walls in Oregon State. Among many beautiful scenic panoramas within the scenic area's boundaries is Multnomah Falls, the second highest year-round waterfall in the United States. This beautiful region was designated a National Scenic Area by Congress in 1987. Further, the four Tribal nations of Yakama Nation, Confederated Tribes of Warm Springs Nation, Confederated Tribes of the Umatilla Nation and Nez Perce Nation have Treaty Rights within the Columbia River Gorge National Scenic Area. (*Photographs of the Columbia River Gorge National Scenic Area*)

Improving air quality within the National Scenic Area is a very big challenge because this beautiful scenic area is also a conduit for significant amounts of interstate and intrastate commerce. Interstate 84 runs along the shores of the Columbia River on the Oregon side. Railroad tracks are present on both sides of the Columbia River. Burlington Northern and



Santa Fe Railroad Company operates on the Washington side of the Columbia River and Union Pacific operates on the Oregon side of the Columbia River. (*Photographs of locomotives traveling through the Columbia River Gorge National Scenic Area.*) Also, a large quantity of goods and commerce are moved by towboat up and down the Columbia River through the heart of the Columbia River Gorge National Scenic Area. (*Photographs of towboats traveling through the Columbia River Gorge National Scenic Area.*) Consequently, the Columbia River Gorge National Scenic Area experiences high volumes of locomotive and marine diesel traffic traveling through it. In addition, the nearby large Port of Portland and Port of Vancouver are major export and import ports on the West Coast.

EPA's assistance in obtaining expeditious air quality improvements within the Columbia River Gorge National Scenic Area are desired by the Washington and Oregon Clean Air Agencies as well as several other organizations such as the four Tribal Nations who have Treaty Rights in the Gorge. This area is viewed so important by Congress that a couple of years ago Congress directly appropriated \$1.1 million for air quality studies in this beautiful National Scenic Area.

I would now like to propose a few questions:

- (1) How would EPA respond if you knew that locomotives were annually releasing 8,363 tons of nitrogen oxides within the Columbia River Gorge National Scenic Area?
- (2) How would EPA respond if you knew that towboats were annually releasing another 768 tons of nitrogen oxide emissions within the Columbia River Gorge National Scenic Area?
- (3) How does EPA believe its Nation-to-Nation Tribal consultation responsibilities should be handled for air quality impacts caused by locomotives and marine diesel engines traveling through the Columbia River Gorge National Scenic Area?

Tables 1 through Table 8 provide the 2004 emissions of locomotives and towboats released within the Columbia River Gorge National Scenic Area and the entire State of Washington and State of Oregon. Several local commerce expansion announcements have been made since 2004 that suggest higher locomotive and towboat traffic volumes are already occurring or will be occurring in the near future; suggesting that the provided emission estimates in Tables 1 through Table 8 may actually be higher. These announcements include: (1) Centralia Coal-fired Power Plant's closure of its mine mouth coal operation that provided approximately 90% of its 1,340 Megawatt capacity fuel needs and now having 100% of its coal needs being met by Wyoming coal train shipments; (2) construction of two large Ethanol Plants with the bulk of the grain being provided from the Midwest via train shipments; and (3) construction of a new grain export terminal for Midwest grain that will exceed the current largest such facility on the West Coast by a factor of 4 to 5 times.

Table 1
Line Haul Locomotive Emissions
Within the Columbia River Gorge National Scenic Area

NO_x – 8,363 tons of emissions*
CO – 826 tons of emissions
VOC – 319 tons of emissions
PM_{2.5} – 194 tons of emissions
SO₂ – 635 tons of emissions

*** Combined 2004 emissions of Burlington Northern and Santa Fe Railroad (BNSF) and Union Pacific (UP).**

Table 2
Switchyard Locomotive Emissions
In Vancouver, WA Adjacent to Gorge

NO_x – 156 tons of emissions*
CO – 17 tons of emissions
VOC – 9 tons of emissions
PM_{2.5} – 4 tons of emissions
SO₂ – 11 tons of emissions

*** Based on 2004 diesel fuel consumption.**

Table 3
Switchyard Locomotive Emissions
In Portland, OR Adjacent to Gorge

NO_x – 332 tons of emissions*
CO – 36 tons of emissions
VOC – 20 tons of emissions
PM_{2.5} – 8 tons of emissions
SO₂ – 12 tons of emissions

*** Based on 2004 diesel fuel consumption.**

Table 4
Statewide Switchyard Locomotive Emissions
In State of Washington During 2004

NO_x – 1,462 tons of emissions*
CO – 157 tons of emissions
VOC – 87 tons of emissions
PM_{2.5} – 35 tons of emissions
SO₂ – 106 tons of emissions

*** Based on 2004 diesel fuel consumption.**

Table 5
Statewide Locomotive Emissions
In State of Washington During 2004

Burlington Northern and Santa Fe Railroad, Union Pacific and Amtrak:*

NO_x – 28,104 tons of emissions

CO – 2,878 tons of emissions

VOC – 1,087 tons of emissions

PM_{2.5} – 667 tons of emissions

SO₂ – 2,782 tons of emissions

* Based on 2004 total diesel fuel consumption of approximately 98,244,000 gallons by BNSF, UP and Amtrak. Burlington Northern and Santa Fe Railroad (BNSF) and Union Pacific (UP) operate approximately 700 Line Haul Locomotives and 130 Switchyard Locomotives within Washington. Amtrak operates approximately 24 Locomotives within Washington and at least another 40 Locomotives are operated by smaller short haul and switchyards in Washington.

Table 6
Statewide Locomotive Emissions
In State of Oregon During 2004

NO_x – 11,026 tons of emissions*

CO – 1,144 tons of emissions

VOC – 455 tons of emissions

PM_{2.5} – 271 tons of emissions

SO₂ – 521 tons of emissions

* Based on 2004 diesel fuel consumption.

Table 7
Towboat Emissions
Within Columbia River Gorge National Scenic Area

NO_x – 768 tons of emissions*

CO – 100 tons of emissions

VOC – 32 tons of emissions

PM – 102 tons of emissions

SO₂ – 404 tons of emissions

* Total 2004 diesel fuel consumed was 3,563,000 gallons.

Table 8
Total Towboat Emissions
Snake River, Columbia River and Willamette River

NO_x – 7,129 tons of emissions*

CO – 925 tons of emissions

VOC – 300 tons of emissions Total diesel fuel consumed in 2004 was approximately 98,244,000 gallons by BNSF, UP and Amtrak.

PM – 950 tons of emissions

SO₂ – 3,752 tons of emissions

* Towboats operating on the three rivers consumed a total of 14,443,000 gallons of diesel in 2004.

I would also like to convey that acid deposition within the Columbia River Gorge National Scenic Area has been studied by the USDA Forest Service and their concerns about ecosystem damage have been clearly made known to the Washington and Oregon Clean Air Agencies through USDA Forest Service's Fog Water Impacts Study.

Finally, the four Tribal Nations of Yakama Nation, Confederated Tribes of Warm Springs Nation, Confederated Tribes of the Umatilla Nation and Nez Perce Nation have Treaty Rights within the Columbia River Gorge National Scenic Area and have expressed firmly their concern about air quality impacts on their cultural resources and fishing rights within the Gorge. Under EPA's Nation-to-Nation consultation responsibilities with the Tribal Nations, EPA has the ability within this rulemaking to be responsive to the concerns of the four (4) Tribal Nations. The Southwest Clean Air Agency's proposed new rule language will demonstrate your responsiveness to their Treaty Rights and ancestral concerns.

Conclusion

For reasons of improving public health within the Portland, OR/Vancouver, WA metropolitan area, improving air quality in nearby Class 1 areas, improving air quality within the Columbia River Gorge National Scenic Area and affirmatively responding to EPA's Nation-to-Nation consultation and resource protection responsibilities with the four Tribal Nations having Treating Rights within the Columbia River Gorge National Scenic Area, the U.S. Environmental Protection Agency should incorporate new rule language that requires:

“Locomotives and Marine Diesel Engines traveling through a federally designated National Scenic Area or Class 1 Area and a Major Metropolitan Area must be designated for first application of remanufactured and newly built locomotives and marine diesel engines.”

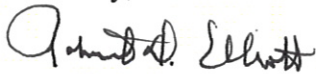
This new language will provide public health benefits for citizens of the Portland, Oregon and Vancouver, Washington metropolitan areas that these same pieces of equipment travel through. It will also assist the State of Washington and State of Oregon in achieving compliance with EPA's Regional Haze rules and impacts on the Class 1 areas that are

adjacent to the Columbia River Gorge National Scenic Area. As you make your final decision on this request, ask yourself this question: "How many areas have been designated by Congress and set aside in perpetuity for its beauty and the enjoyment of future generations that have locomotive and marine diesel engine annual emissions totaling approximately 9,131 tons of nitrogen oxides and approximately 296 tons of PM_{2.5} emitted within the federally designated national scenic area?" Clearly some additional action by EPA is needed.

Your response will determine whether the Columbia River Gorge National Scenic Area, the four Tribal Nations' concerns, USDA Forest Service acid deposition concerns, and the public health of citizens in the Portland, Oregon and Vancouver, Washington metropolitan area will be adequately addressed by this proposed rule. I hope that you will adopt the new rule language that I have recommended.

Thank you for this opportunity to comment on the proposal. Please contact me at (360) 574-3058 or email: bob@swcleanair.org if I can provide any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert D. Elliott". The signature is fluid and cursive, with the first name "Robert" and last name "Elliott" clearly distinguishable.

Robert D. Elliott
Executive Director