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July 13, 1999

Office of Air, Recycling and Radiation Protection

717-772-2724

Public Docket No. A-99-06
U.S. Environmental Protection Agency
Air Docket Section
Room M-1500
401 M Street SW
Washington, DC 20460

Re: Public Docket No. A-99-06
Advance Notice of Proposed Rulemaking
Control of Diesel Fuel Quality

Dear Sir or Madam:

Thank you for the opportunity to comment on the May 13, 1999 Advance Notice of Proposed Rulemaking on the control of diesel fuel quality. Pennsylvania commends EPA for opening the diesel fuel dialogue at the same time it proposes sulfur controls on gasoline. This allows all interested parties the opportunity to make cost-effective decisions based on any comprehensive regulatory changes. We urge EPA to proceed with the rulemaking as soon as possible so that the public can realize the full air quality benefits of both vehicle and fuel decisions.

We commend EPA for understanding that considering fuel and advanced engine technology as a system yields the most cost-effective emission reductions.

As you point out, controlling NO_x emissions is a greater challenge for diesel engines than for gasoline engines. If the technical information you receive from the ANPRM indicates that the potential for reasonably-priced advanced catalyst technology would be enabled by low sulfur diesel fuel, then fuel changes should be even more cost-effective for diesel vehicles than for gasoline vehicles. Lowering sulfur in fuel and improving engine systems will ensure that the financial burdens of reducing emissions from these vehicles are shared more equitably between engine manufacturer and fuel suppliers. This equilibrium should lower costs for vehicle purchasers.

There is no question of the need for reductions in mobile source emissions. Diesel vehicles, particularly heavy-duty highway vehicles, are now and will continue to be significant contributors to air pollution in Pennsylvania. Trucking is a major industry in Pennsylvania, which serves as a major distribution center for the eastern United States. Cleaner trucks will help make the industry less objectionable to the public.

EPA's regulation of diesel fuel and diesel vehicle technology is crucial to the attainment and maintenance of the one-hour ozone standard in the I-95 corridor, and to the attainment of any eight-hour and fine particulate matter standards. This dual strategy should be an integral part of the national plan to control nitrogen oxides regionally as well as controlling regional haze in the eastern United States. We suggest that in the regulatory impact analysis of its proposed rule, EPA collect and include information on the effects of the regulation on ozone, particulates, toxics, regional haze and greenhouse gases.

Because Pennsylvania has ozone stakeholder groups presently in operation in its central counties, we have very recent data on vehicle miles traveled and NOx emissions in those areas. For example, Southcentral Pennsylvania (Dauphin, Cumberland, Lebanon, Lancaster and York counties) is an area where mobile sources contribute about half of all NOx emissions. Miles traveled by diesel vehicles in that area will increase 35 percent from 1996 to 2007. Despite application of the 2004 new truck standards, diesel vehicles will still contribute about 30 percent of highway NOx in 2007 (down slightly from 1996), and about 14 percent of all NOx emissions. Our projections for this area also indicate a trebling of VMT for light-duty diesel trucks. This local area, like many in Pennsylvania, would benefit substantially from lower NOx emissions from diesel vehicles, and in particular, would benefit from emissions reductions from existing vehicles that a fuel strategy can provide.

Pennsylvania believes that a diesel fuel program absolutely must be a national, not regional, program due to the nature of the interstate trucking industry. We would also support a national cap on nonroad diesel as soon as possible, to obtain immediate emission reductions, prevent sulfur dumping and avoid providing incentives for illegal use of nonroad diesel fuel for highway vehicles. EPA should implement the program in coordination with new diesel vehicle requirements, which means as close to 2004 as possible.

EPA had asked for comments on concepts which would phase in lower sulfur fuel at different times for light and heavy duty diesels. Pennsylvania suggests that EPA should avoid requirements that further segregate fuel. Not only does this raise very complicated distribution system issues, but there is greater potential for environmental harm with more petroleum storage tanks to monitor for potential leaks and spills.

We would be interested in having EPA develop a proposal for encouraging the use of petroleum blends like biodiesel, synthetic diesel or liquified natural gas. Pennsylvania has had a state-funded grant program for alternative fuels for several years and is interested in finding other mechanisms to speed the use of alternative fuels into the diesel vehicle fleet.

It is essential that EPA collect durability and maintenance information as much as possible, in order to quantify possible financial benefits which would offset any increased fuel costs to diesel vehicle operators.

Thank you for the opportunity to comment on the advance notice of proposed rulemaking. We look forward to commenting on a proposed rule in the very near future.

Sincerely,

Denise K. Chamberlain
Deputy Secretary for
Air, Recycling and Radiation Protection

cc: Carol Connell, U.S. EPA