

Cleaner Diesel Handbook



BRING CLEANER FUEL AND DIESEL RETROFITS
INTO YOUR NEIGHBORHOOD

APRIL 2005

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ENVIRONMENTAL DEFENSE

finding the ways that work

Retrofit programs in State Implementation Plans

One way a state may be able to achieve emissions reductions that can be factored into its State Implementation Plan (SIP) is by including a rigorous retrofit program. A State Implementation Plan is a federally enforceable plan that describes a state's strategy for achieving and maintaining the public health based National Ambient Air Quality Standards (NAAQS).²⁴⁹

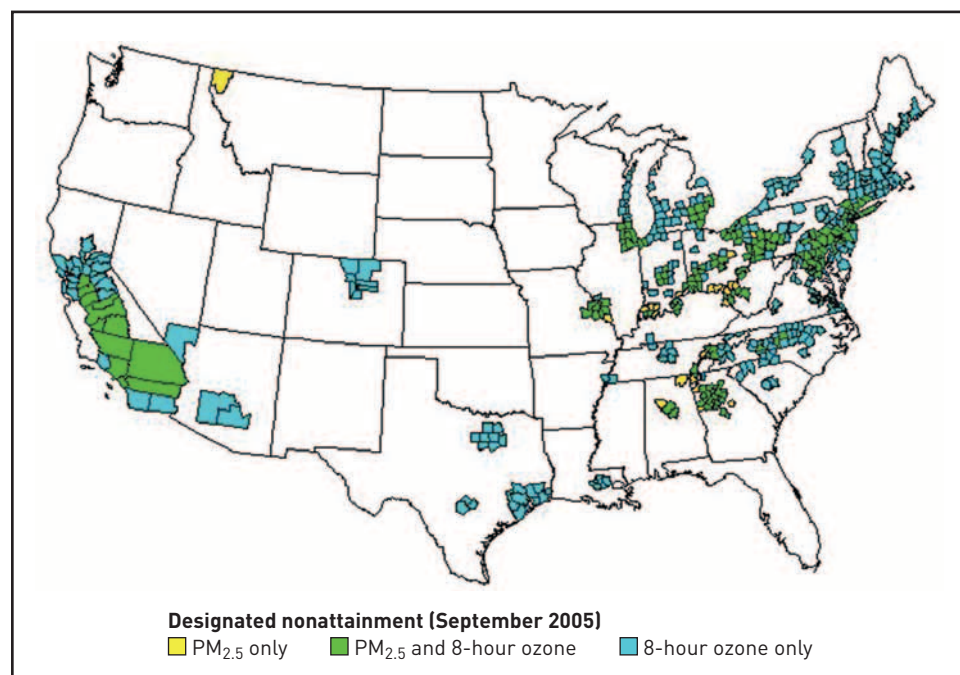
Recent EPA data shows that about half of all Americans live in places that fail to meet public health based standards for ozone and/or fine particulates. On April 15, 2004, EPA found 474 counties—home to 159 million Americans—out of compliance with the health-based eight-hour ozone standard.²⁵⁰ In December 2004, EPA found that 224 counties in 20 different states are not meeting the nation's first PM_{2.5} air quality standards.²⁵¹

- To find out whether or not you live in a county that is meeting the public health based standards for ozone go to: <http://www.epa.gov/ozonedesignations/statedesig.htm>.
- To find out whether or not you live in a county that is meeting the federal PM_{2.5} standards go to: <http://www.epa.gov/pmdesignations/finaltable.htm>.

Because more than half of the U.S. population lives in areas with unhealthy air, Environmental Defense believes that retrofit programs for all diesel equipment currently in use are critical components of any SIP.

If an area does want to quantify the benefits of a retrofit program, it may be able to do so by incorporating the benefits into the SIP, and it may also be able to use the benefits to demonstrate

FIGURE 11
Counties designated nonattainment for PM_{2.5} and/or 8-hour ozone standard



Several counties have only a portion designated nonattainment. These counties are represented as whole counties on the map.

Source: <http://www.epa.gov/oar/oaqps/greenbk/mappm25o3.html>

conformity to its SIP. Areas with large retrofit programs should work with the appropriate EPA Regional Office²⁵² regarding SIP credits.²⁵³ EPA encourages early consultation between project sponsors, planners, and EPA Regional Offices during the development of a SIP and the calculation of SIP credits. Including a program in a federally enforceable document should be done carefully as legal action can be taken if the program is not carried out as described.

Additionally, project sponsors should work with their state air quality and transportation agencies as well as federal DOT and EPA regarding inclusion of a retrofit program in a SIP or conformity determination and the credits of that program. The state air pollution agency should assume primary responsibility for

the calculation of retrofit credits and incorporation into the SIP. With the guidance of the appropriate EPA Regional Office, the state should work with areas, sponsors, planners, fleets, etc. in implementing retrofit projects and programs for this purpose.

To learn more about calculating SIP credits from retrofit projects, please refer to the EPA web page at: <http://www.epa.gov/otaq/retrofit/aqsipcalc.htm> (“Guidelines For States On Establishing SIP Credits From Heavy-Duty Engine Retrofit Projects”). A NESCAUM report, prepared for EPA in 1999, is a good resource for more information on how these types of calculations are made.²⁵⁴ EPA is expected to issue additional guidance on how to calculate SIP credits for retrofits in Spring of 2005.²⁵⁵