



Statement of the OTC Calling on the EPA to Establish Tier 3 Light-Duty Motor Vehicle Fuel and Criteria Pollutant Emissions Standards

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Anna Garcia
Executive Director

The Ozone Transport Commission (OTC) states call on the U.S. Environmental Protection Agency (EPA) to update its requirements regarding the criteria pollutant emissions standards for light-duty motor vehicles. Those requirements were established in 1999 and have not been updated to reflect advances in automotive technologies.

Specifically, a Tier 3 program should be harmonized with the proposed tailpipe, evaporative emissions, and fuel standards in the state of California, which is known as the Low Emission Vehicle (LEVIII) program. A Tier 3 program should also provide emission reductions that go beyond offsetting the emissions increases resulting from the implementation of the Renewable Fuel Standard (RFS2), as deeper reductions are critical to attaining and maintaining the current and anticipated revised ozone health standard. Furthermore, EPA should revise certification procedures to ensure that fuels used in certification are consistent with currently or commonly available motor vehicle fuels

Motor vehicles are significant sources of emissions that lead to the formation of ozone and to toxic air emissions. Recent photochemical screening modeling and highway vehicle emissions calculations using the new Motor Vehicle Emission Simulator (MOVES) model by the OTC and others have demonstrated that additional reductions, particularly for motor vehicle NOx emissions, are critical to attaining and maintaining the current and anticipated revised ozone ambient standard.

There have been significant advances in emission control performance that have occurred since 1999. Tighter standards should be adopted and implemented to reflect these advancements.

In President Obama's May 2010 Presidential Memorandum on Fuel Efficiency Standards for vehicles, the President directed EPA to review the adequacy of current motor vehicle tailpipe standards and update them as necessary.

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The OTC states have previously called on EPA to update its requirements regarding the use, installation and purchase of aftermarket catalytic converters.

Given the important role the northeast and mid-Atlantic states have played in the development of the federal motor vehicle emission control program, states in the region are prepared to assist EPA as it develops a proposal for further vehicle emissions controls.

Adopted by the Commission on November 10, 2010

A handwritten signature in blue ink, appearing to be "John D. ...", written over a horizontal line.

Chair