

**Summary and Analysis of Comments:  
Control of Emissions of Air Pollution  
from Locomotive Engines and Marine  
Compression Ignition Engines Less than  
30 Liters Per Cylinder**

**Chapter 1  
General**

Assessment and Standards Division  
Office of Transportation and Air Quality  
U.S. Environmental Protection Agency



United States  
Environmental Protection  
Agency

EPA420-R-08-006  
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## 1. GENERAL POSITION STATEMENTS

### *What We Proposed:*

The following comments relate in general to the Notice of Proposed Rulemaking (NPRM). The comments in this section are not on any specific aspect of the proposed rule; rather, they are directed to the general substance of the proposal. More detailed proposal items, and their corresponding comments, can be found in later chapters of this Summary and Analysis of Comments.

For more information on the proposed rule, please see the Federal Register at 72 FR 15938, published on April 3, 2007: [<http://a257.g.akamaitech.net/7/257/2422/01jan20071800/edocket.access.gpo.gov/2007/pdf/07-1107.pdf>].

### 1.1 Support for Rule

#### *What Commenters Said:*

The comments we received stated that commenters generally supported the intent of the proposed rulemaking in minimizing exhaust emissions for locomotives and marine diesel engines. However, many of these commenters stated that, although they support the intent of proposed rule, they believe that the rule could be improved; each commenter offered their various suggestions on how they believed that the rule could be improved, and these comments are summarized in the following chapters of this Summary and Analysis document.

In general, these comments include recommendations on the stringency and timing of the standards, costs, technical feasibility, and timing of the final rule. Some commenters expressed the concern that the rule was not stringent enough (suggesting that EPA finalize more stringent standards, accelerate the proposed implementation dates, finalize the rule by the end of 2007, etc.), while others were concerned that the rule was too stringent (e.g., standards are infeasible or too costly, insufficient lead time, etc.). Other issues raised by individual commenters centered on safety concerns, fuel availability concerns, and the belief that EPA did not engage all potentially affected parties.

#### Letters:

American Lung Association (ALA) OAR-2003-0190-0509  
American Lung Association of Metropolitan Chicago OAR-2003-0190-0518  
American Lung Association of the Northwest OAR-2003-0190-0482  
American Waterways Operators (AWO) OAR-2003-0190-0519  
Association of American Railroads (AAR) OAR-2003-0190-0566.1  
Caterpillar Inc. (Caterpillar) OAR-2003-0190-0485  
Clean Air Task Force (CATF) OAR-2003-0190-0499

Clean Air Watch OAR-2003-0190-0500  
 Columbia River Gorge Commission OAR-2003-0190-0516  
 Cummins Inc. OAR-2003-0190-0501  
 Electro-Motive Diesel, Inc. (EMD) OAR-2003-0190-0502  
 Engine Manufacturers Association (EMA) OAR-2003-0190-0545  
 Environmental Defense OAR-2003-0190-0487  
 Friends of the Earth OAR-2003-0190-0609  
 (City of) Houston Bureau of Air Quality Control (BAQC) OAR-2003-0190-0561.1  
 Johnson Matthey OAR-2003-0190-0488  
 Manufacturers of Emission Controls Association (MECA) OAR-2003-0190-0494  
 Markle Marine Safety Services OAR-2003-0190-0547.1  
 Marathon Petroleum Company LLC OAR-2003-0190-0595.1  
 MIRATECH OAR-2003-0190-0505  
 Missouri Department of Natural Resources, Air Pollution Control Program OAR-2003-0190-0658  
 MTU Detroit Diesel, Inc. OAR-2003-0190-0573.1  
 National Association of Clean Air Agencies (NACAA) OAR-2003-0190-0495  
 National Park Service-Pacific West Region (NPS) OAR-2003-0190-0480  
 Natural Resources Defense Council (NRDC) OAR-2003-0190-0489  
 New Jersey Department of Environmental Protection, Air Quality Management (NJDEP) OAR-2003-0190-0562.2  
 New York Department of Environmental Conservation, Office of Air Resources OAR-2003-0190-0583.1  
 North Kingston Community Association OAR-2003-0190-0496  
 Northeast States for Coordinated Air Use Management (NESCAUM) OAR-2003-0190-0512, 0551.1  
 Northwest Environmental Defense Center, Oregon Toxics Alliance, Columbia Riverkeeper, Friends of the Columbia Gorge, Northwest District Association Health and Environment Committee OAR-2003-0190-0593.1  
 Oregon Department of Environmental Quality, Air Quality Division (ODEQ) OAR-2003-0190-0506  
 Oregon Environmental Council (OEC) OAR-2003-0190-0652  
 Passenger Vessel Association (PVA) OAR-2003-0190-0507  
 People for Puget Sound OAR-2003-0190-0649  
 Port of Seattle OAR-2003-0190-0469.1  
 Private Citizens (*various*)  
 Puget Sound Clean Air Agency OAR-2003-0190-0484  
 Rail World, Inc. OAR-2003-0190-0474  
 Railpower Hybrid Technologies Corp. OAR-2003-0190-0492  
 San Joaquin Valley Air Pollution Control District OAR-2003-0190-0556.1  
 South Coast Air Quality Management District (SCAQMD) OAR-2003-0190-0483  
 Southwest Clean Air Agency OAR-2003-0190-0468  
 Texas Commission on Environmental Quality (TCEQ) OAR-2003-0190-0612.1  
 Washington State Department of Transportation (WSDOT) OAR-2003-0190-0555.2  
 Washington State Ferry System (WSF) OAR-2003-0190-0555.2

Wisconsin Department of Natural Resources, Bureau of Air Management (WDNR)  
OAR-2003-0190-0552  
Wyoming Outdoor Council OAR-2003-0190-0467

*Our Response:*

We appreciate all comments on the proposed rule; specific responses to the various concerns raised by individual commenters are in chapters 2 through 11 of this Summary and Analysis of Comments document.