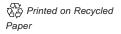


Air Conditioning Correction Factors in MOBILE6



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1.0 ABSTRACT

Revised air conditioning exhaust emission correction factors are included in MOBILE6. The proposed factors are based on testing of 38 vehicles at two locations, using a test procedure meant to simulate air conditioning emission response under extreme "real world" ambient conditions. These factors are meant to predict emissions which would occur during full loading of the air conditioning system, and will be scaled down in MOBILE6 according to ambient conditions input by the user if appropriate. It was concluded that the data used in the development of the proposed factors adequately represents real world conditions, based on the results of a correlation vehicle tested at both test sites and a full environmental chamber. In general, running emissions were found to increase during air conditioning operation, but under some conditions HC and CO emissions decreased. Correction factors for start driving were also assessed.

2.0 INTRODUCTION

Recent studies conducted primarily as part of the Supplemental Federal Test Procedure (SFTP) rulemaking development process indicate that vehicle fuel consumption and exhaust emissions increase substantially when the air conditioner is in operation. As the traditional method for accounting for the effects of air conditioner load - increasing dynamometer horsepower by 10% - is not adequate for characterizing this emission increase, new certification test procedures aimed at reducing emissions when the air conditioner is in operation were implemented as part of the SFTP rule. Air conditioning correction factors are included as an optional element of MOBILE5; however, these factors are based on testing performed in the early 1970's and are considered so outdated that the user is discouraged from using them in the MOBILE User's Guide. Given the recent findings on air conditioning emissions, revised air conditioning correction factors are clearly needed.

This report presents the "full-usage" air conditioning exhaust correction factors proposed for MOBILE6. Full-usage correction factors are meant to represent the emission increase when the A/C system is inducing full system load on the vehicle, as would occur under extreme ambient (temperature, humidity and solar load) conditions. Since it not appropriate to apply these factors to all ambient conditions, MOBILE6 will scale these factors down based on the ambient conditions under which the model is being run (the development of appropriate scaling factors is discussed in Report Number M6.ACE.001, "Air Conditioning Activity Effects in MOBILE6"). Discussion in this report includes the testing used to generate A/C emission data, correlation between the two test sites and with expected real-world results, and the development of the full-usage correction factors. The treatment of air conditioning correction factors for vehicles complying with the SFTP requirement are also addressed in this report.

Subsequent to publication of the draft version of this report in March 1998, the document was put out for stakeholder review. Formal peer review comments were also solicited from two independent sources. No comments were received through the stakeholder review process,

hence peer review comments represent the only external feedback received on this report. A summary of peer review comments are contained in Appendix K. Major revisions were made to the methodology presented in the March 1998 version, and a revised report was published in December 1999 as part of the Tier 2 regulatory support documentation. The primary update to this final report from the December 1999 version is the inclusion of the discussion for SFTP benefits in Section 8.0.

3.0 TESTING

3.1 <u>Vehicles</u>

The data used for this analysis was generated through testing performed at EPA's National Vehicle and Fuel Emissions Laboratory and through an EPA contractor, Automotive Testing Laboratories (ATL), in East Liberty, Ohio. 26 vehicles were tested at EPA and 12 were tested at ATL, including one vehicle tested at both locations for correlation purposes (treated as two separate vehicles for the purpose of this analysis). A list of the vehicles tested is contained in Table 1 of Appendix A. The sample consisted of 1990 and later vehicles categorized as follows: 24 cars / 14 trucks, 32 Ported Fuel Injection (PFI) / 6 Throttle-Body Injection (TBI), and 28 Tier 0/10 Tier 1. Each vehicle was designated either as a "normal" emitter or "high" emitter using the following emission cutpoints over the Running LA4¹: 0.8 g/mi HC, 15.0 g/mi CO and 2.0 g/mi NOx (the cutpoints were applied independently for each pollutant, so that a vehicle could be a high emitter for HC and a normal emitter for NOx). These cutpoints yielded five high emitters for HC, three for CO and two for NOx. It should be noted that during the analysis the data was divided into different strata; by facility cycle, vehicle class, etc.. There are some instances in the analysis where a vehicles emissions classification changes. For example, a vehicle that is classified as a normal emitter on the LA94, may have been reclassified as a high emitter for a specific cycle, such as the local cycle.

3.2 <u>Test Procedure</u>

EPA's new air conditioning test procedure is based on use of a full environmental chamber at 95° F, 40% Relative Humidity and full solar load (850 Watts/Meter²). This type of facility was not available to EPA at the time of testing, so use of a procedure which simulated these conditions was required. A/C-on tests were conducted in a standard emission test cell at 95° F and 50 grains/pound of humidity with a standard cooling fan and the driver window down. The A/C system was set according to the SFTP requirements; maximum A/C and blower setting with recirculation mode if so equipped. Rather than attempting to represent a condition that would actually occur in-use, this simulation is meant solely to induce the level of A/C system load on the vehicle which would occur in the real world under extreme ambient conditions. Operating

¹ "Running LA4" emissions were derived from the combination of emissions from Bag 2 and a 505 cycle run warmed-up (i.e. without a soak). More detail on this calculation can be found in MOBILE6 Report No. M6.STE.002, "The Determination of Hot Running Emissions from FTP Bag Emissions"

with the driver window down and with standard cooling is meant to compensate for the lower humidity level and lack of solar load inherent in the standard cell. This simulation method showed adequate correlation with SFTP environmental cell conditions during the development of the SFTP rulemaking², and is a straightforward way to approximate real-world air conditioning emissions using a standard cell setup. A/C-off tests were run in standard FTP ambient conditions (75° F, 50 grains/pound humidity).

The vehicles were run in a warmed-up condition over EPA's facility-specific inventory cycles³, ARB's Unified Cycle (the LA92), and the New York City Cycle one time each with the A/C on and A/C off. A cold start ST01⁴ cycle was also run in both conditions for the purpose of assessing start A/C factors (information on all driving cycles used in this test program is shown in Table 2). The EPA tests were run on a 48-inch electric dynamometer, while the ATL testing used a twin 20-inch electric dynamometer; all tests were run without the 10% A/C load adjustment factor typical to standard emission tests. Both bag and modal data were collected.

3.3 Correlation

Preliminary data presented at the October 1997 MOBILE6 workshop indicated a potential offset between the results from vehicles tested at EPA and those tested at ATL⁵. A/C ratios from the ATL sample were lower than EPA on average for fuel consumption and all three pollutants. This raised a question about whether the simulation as conducted at ATL induced comparable A/C system loading to the procedure as conducted at EPA. A related issue is whether loading induced by the simulation as conducted at either site could be considered "full-usage", as defined for the purpose of this analysis by the conditions used for the SFTP certification test (95° F, 40% Relative Humidity, 850 W/m² solar load). To investigate both issues, a correlation vehicle was run over all test cycles using the simulation procedure at EPA and ATL, and on a subset of cycles under the SFTP test conditions at GM's environmental chamber in Rochester, New York. This vehicle was instrumented to monitor A/C compressor cycling and compressor pressures (high and low side) on a real-time basis to gain a fuller sense of how the vehicle's A/C system was loaded at each location.

Emission results for the four cycles tested at all three locations are shown in Table 3 of Appendix

² Results from a correlation program between this simulation and a full environmental chamber over a sample of six Tier 1 vehicles can be found in AAMA/AIAM's comments to EPA on the proposed SFTP rulemaking (EPA Docket No. A-92-64 Item IV-D-10).

³ For detail on the development of EPA's facility-specific inventory cycles, see MOBILE6 Report No. M6.SPD.001, "Development of Speed Correction Cycles"

⁴ ST01 is a 1.4 mile cycle developed to specifically characterize driving behavior following startup. The cycle was developed from an in-use driving survey conducted in Baltimore, Spokane and Los Angeles as part of the SFTP rulemaking process.

⁵ "A/C Effects in MOBILE6", presentation at the October 1997 MOBILE6 workshop

A. There is quite a bit of variability in the HC, CO and NOx results, making it difficult to discern any clear trend. Judging from the large swings in each pollutant, it appears that the vehicle went into enrichment sporadically between sites, resulting in a wide range of A/C ratio results across the test matrix. Thus, it is difficult to draw conclusions from the emission data (and particularly the A/C ratios) alone. The correlation analysis therefore focused on fuel consumption (carbon) ratio and compressor operation to determine whether a difference in the relative loading placed on the vehicle between the three sites can be distinguished. The carbon ratio results in Table 3 show the ATL results to be slightly lower than EPA for each cycle. However, the EPA and ATL carbon ratios are higher than the GM ratio for three of the four cycles, and the three locations show relatively consistent carbon ratios over the New York City, Unified and Arterial cycles. The exception to the latter point is the High Speed Freeway cycle, for which the GM ratio (as well as the A/C-on carbon levels) are significantly lower than EPA or ATL.

Table 4 of Appendix A contains compressor behavior data, expressed in terms of the compressor fraction (the fraction of time the compressor in engaged during the test), and average high and low side compressor pressures, on which compressor torque in based. The data indicate that a) the compressor was engaged at all locations 97% or more of the time on each of the cycles, and b) for the New York City, Unified and Arterial cycles a strong difference is not observed in the compressor pressures. The exception again is the High Speed Freeway cycle, for which the GM data shows significantly lower compressor pressures than ATL or EPA. From these data and the fuel consumption results, it is apparent that the A/C system load on the high speed freeway cycle in the full environmental cell was much less than that produced by the simulation at EPA or ATL. The most plausible explanation for this is the use of a variable speed fan in the full environmental cell, which would create a much higher airflow than produced by the standard one-speed fan used on the simulation. Higher air flow across the vehicle's A/C system can increase system efficiency, reducing relative load demand on the engine. This suggests that the simulation could be over predicting A/C loading (and hence emissions) at the higher speed levels; however, this effect does not appear in the overall LA92 results, a cycle which also contains significant high speed operation. Unfortunately sufficient data does not exist over high speed operation with representative air flow to make a more full assessment; further research will be needed to address this issue.

From the fuel consumption and compressor data it was concluded for the purposes of this study that despite observed emission differences between ATL and EPA, the vehicles were adequately loaded at both sites to represent full-usage conditions. Therefore, no vehicles will be excluded from the analysis and the emission results from the data set will be used directly (i.e. with no scaling) to develop the full-usage correction factors.

4.0 DATA

As with previous versions of the model, MOBILE6 will contain correction factors which estimate the emission impact of changes in temperature. Emissions at temperatures higher than

75° F will be determined in the model first by applying a base temperature correction, then applying the A/C correction factor appropriate for that temperature. A/C correction factors must be developed separately from the baseline temperature corrections in order to avoid double-counting temperature impacts. For this analysis, therefore, the A/C-off results were corrected from the temperature the test was conducted (nominally 75°, although minor variability is common) to the A/C-on temperature (nominally 95°) for each paired test. Since MOBILE6 temperature correction factors will not change from the MOBILE5 corrections, MOBILE5 temperature corrections were used⁶. The Bag 2 corrections were used for all running tests, and Bag 1 corrections were used for the cold start ST01 test⁷.

Once the temperature correction was applied, the A/C impact was analyzed by taking the difference between vehicle emissions with A/C on and the corrected vehicle emissions with the A/C off (A/C base). This impact is referred to throughout this report as the "A/C effect." This approach to looking at A/C impact differs from the proposed approach in the draft version of this report. The draft proposal looked at the A/C impact as a ratio, therefore making the A/C correction factor a multiplicative adjustment. This significant shift in approach between the draft and final report because of concern that the multiplicative adjustment approach may overstate the impact of air conditioning on emissions. The use of an additive A/C effect is meant to mute the emission impact for technologies which were not represented in the A/C dataset. The shift from a multiplicative to an additive approach was supported by peer review comments, as discussed in Appendix K.

5.0 RUNNING CORRECTION FACTORS ANALYSIS

The development of running correction factors requires analysis of what vehicle groupings merit separate treatment. Simple factorial Analysis of Variance (ANOVA) was used, for each pollutant, to look at the A/C effect as a function of the following factors: base emissions (i.e. without A/C), referred to as "A/C base"; vehicle class (i.e. cars vs. trucks), emitter category (i.e. high emitter vs normal emitter), average cycle speed, and facility cycle. For the purposes of this analysis, a factor is considered significant if it is below the 0.05 significance level. Also, for each pollutant both linear space and log space fits were investigated. For each pollutant, the best fit was chosen. A more detailed analysis to determine the appropriate stratifications given sample size and technical merit followed this initial screening. A discussion of this investigation follows for each pollutant.

5.1 <u>NMHC</u>

⁶ The temperature corrections will be modified to accommodate the start/running split new to MOBILE6, but the base corrections will not change. The start/running split has not be developed, so for this analysis the MOBILE5 Bag corrections were applied.

⁷ MOBILE5 temperature correction factors can be found in "Compilation of Air Pollutant Emission Factors, Volume II - Mobile Sources" (AP-42), Page H-24

Based on the following analysis, MOBILE6 will contain two equations that will model the A/C effect for NMHC for vehicles classified as normal emitters. There will be no A/C effect for NMHC for vehicles classified as high emitters. The initial screening ANOVA results indicate significance to the 0.05 level for A/C base and for emitter category. (See Appendix B, Section A; Test of Between-Subjects Effects⁸) Therefore, a more in depth analysis was performed looking at A/C effect for both normal emitters and high emitters separately.

5.1.1 Normal Emitters - Freeway, Arterial, Ramp

ANOVA was performed over a sample of vehicles that are classified as normal emitters for NMHC, with A/C effect as the dependant versus A/C base, average speed, facility cycle, and vehicle class. The results of this analysis indicate facility cycle as a significant factor. (See Appendix B, Section B; Test of Between-Subjects Effects) When looking at the pairwise comparisons for facility cycle it is evident that the Local cycle was significantly different from the others (for the purpose of this analysis and throughout the report, Local cycle refers to the Local facility cycle and the NYCC facility cycle combined).(See Appendix B, Section B; Pairwise Comparison) Therefore the Local cycle was removed from the sample (to be analyzed separately) and ANOVA was performed on the remaining sample. Again, A/C effect was the dependant as a function of the following factors: A/C base, average speed, and vehicle class. The results of this analysis indicated that there would be one correction factor for both LDVs and LDTs, and that average speed was the only significant factor.(See Appendix B, Section C; Test of Between-Subjects Effects) Therefore, an equation that will model the NMHC correction factors for all normal emitters, on all facility cycles, excluding Local, was developed by fitting a linear function to the sample by average speed. (See Appendix B, Section E; Parameter Estimates)

A/C Effect = $0.001162*(Speed); R^2 = .044$

Figure 1 in Appendix C show the predicted A/C effect, based on the above equation, versus the original data for all vehicles on each facility cycle.

5.1.2 Normal Emitters - Local Cycle

Next, ANOVA was performed on the sample that contained only tests performed on the Local cycle. For this analysis, A/C effect was looked at as a function of vehicle class, average speed and A/C base. The results of this analysis indicated that there was significance to the 0.05 level for vehicle class.(See Appendix B, Section F; Test of Between-Subjects Effects) When looking at the pairwise comparisons for vehicle class, it showed the significance was between LDT1 and LDT2, and between LDV and LDT2. (See Appendix B, Section F; Pairwise Comparison)

⁸ The corrected vehicle emissions with the A/C off (i.e. A/C Base) is referred to as NMHC_Off, CO_Off, and NOx_Off in the ANOVA results. Also "Veh_Class" refers to LDV, LDT1 and LDT2, while "Class" refers to LDV and LDT

However, because the LDT2 results are based on a sample of only 3 trucks, it was decided that the truck classes should not be split, but instead would be combined and re-analyzed. This reanalysis shows there is no significant difference between LDVs and LDTs. It also indicated no significance for average speed, but that there is significance to the 0.05 level for A/C base. (See Appendix B, Section G; Test of Between-Subjects Effects) Therefore, the following equation was developed to model the NMHC A/C effect for all normal emitting vehicles on the local cycle: (See Appendix B, Section H; Parameter Estimates)

A/C Effects = 0.506 * (A/C Base); R² = .127

Figure 2 in Appendix C show the predicted A/C effect, based on the above equation, versus the actual data.

5.1.3 High Emitters - Freeway, Arterial, Ramp, Local

ANOVA results indicate that vehicle class and A/C base are significant. (See Appendix B, Section I; Test of Between-Subjects Effects) As with normal emitters, the pairwise comparison shows LDT2 are significantly different from LDT1 and LDVs. (See Appendix B, Section I; Pairwise Comparison) Again, due to the small sample size for LDT2 (only 1 truck), the truck classes were combined and re-analyzed. The results of this analysis did not indicate any significant difference between LDVs and LDTs, but did indicate A/C base to be significant. (See Appendix B, Section J; Test of Between-Subjects Effects) An equation to model high emitters for NMHC was developed from this analysis. (See Appendix B, Section K; Parameter Estimates) When the predicted A/C effect, based on this equation, was plotted versus the original data, the graphs show the equation to be over predicting the A/C effect. (See Figures 3-16 in Appendix C) The original data lies very near or below the zero gram/mile mark. This strongly indicates that there is no A/C effect for NMHC high emitters. The technical basis for this observation is that it is more likely that NMHC high emitters are operating with enrichment and/or very low catalyst efficiency without air conditioning. There is less opportunity for emissions to increase significantly when efficiency with the A/C on won't have the same relative impact. Therefore, based on this observation, there will be no NMHC A/C effect for vehicles classified as NMHC high emitters.

5.2 <u>CO</u>

Based on ANOVA results, there will be five equations in MOBILE6 used to model A/C effect for CO. The initial screening ANOVA results indicate that the sample should be separated by emission category and that the Local cycle is significantly different from the other cycles, therefore warrantying separate analysis. (See Appendix D, Section A; Pairwise Comparison) Also, the results indicate that the sample should be separated by vehicle class, LDV vs LDTs. (See Appendix D, Section B; Test of Between-Subjects Effects) The following will describe the analysis used to determine each equation for each subcategory.

5.2.1 Normal Emitters - Freeway, Arterial, Ramp

The normal emitter samples for LDVs and LDTs, not tested on the local cycle, were analyzed using ANOVA, looking at A/C effect as a function of A/C base and average speed. Average speed and A/C base are significant factors for LDVs (See Appendix D, Section C; Test of Between-Subjects Effects), while average speed is the only significant factor for LDTs. (See Appendix D, Section D; Test of Between-Subjects Effects) The following equations were developed by fitting a linear function through each sample based on the significant factors for each.

Light-Duty Vehicle A/C Effect = 0.815*(A/C base) + 0.05272*(Speed); $R^2 = .255$ Light-Duty Truck A/C Effect = 0.104*(Speed); $R^2 = .059$

Figures 1 & 2 in Appendix E show the predicted A/C effect, based on the above equations, versus the original data.

5.2.2 High Emitters - Freeway, Arterial, Ramp

In MOBILE6 there will be a CO A/C effect for vehicles classified as high emitters for CO, but only for average speeds below nineteen miles per hour (19 mph). For average speeds above 19 mph, there will be no CO A/C effect for high emitters. This is based on analysis of a sample of vehicles classified as high emitters for CO and excludes the vehicles' test on the Local cycle. This section describes this analysis.

The initial screening ANOVA resulting in the development of an equation based on CO base and average speed, that modeled all vehicle classes. (See Appendix D, Section E; Parameter Estimates) When this equation was plotted against the data, the graphs showed the model to be overestimating the A/C effect for cycles with an average speed greater than 19mph. The data showed the A/C effect, for these cycles, to be near or below zero. Based on this observation, the sample was split into two sets; cycles with an average speed below 19 mph and cycles with an average speed above 19 mph. It was concluded that for average speed above 19 mph, there will be no CO A/C effect for high emitters. The sample with average speed below 19 mph was reanalyzed.

ANOVA was performed on the sample of high emitters with cycles having an average speed below 19 mph. CO effect was the independent and vehicle class, CO base, and average speed were the factors. The results of this analysis indicates there is no significant difference between LDVs and LDTs, therefore, vehicle classes were combined for continued analysis. (See Appendix D, Section F; Test of Between-Subjects Effects) Continued analysis indicates that CO base is the only significant factor for high emitters on cycles with an average speed below 19 mph. (See Appendix D, Section G; Test of Between-Subjects Effects) Based on these results, an equation was developed by fitting a linear function through the sample based on CO base. (See Appendix D, Section H; Parameter Estimates) The following equation models all vehicles classified as CO high emitters on cycles with an average speed less than 19 mph:

CO Effect = 0.154 * (CO base); R² = .831

Figures 3 in Appendix E show the predicted A/C effect, based on the above equation, versus the original data.

5.2.3 Local Cycle

The first look ANOVA of vehicles tested only on the local cycle determined that A/C base is significant and that there is a significant difference between LDT1 and LDT2. (See Appendix D, Section I; Test of Between-Subjects Effects) Again, based on the fact that there were very few LDT2 in the sample (only 4 trucks), LDT were not split. Continued analysis developed an equation to model A/C effect for all LDVs and LDTs on the Local cycle. (See Appendix D, Section J; Parameter Estimates) The predicted A/C effect was calculated based on this linear equation and was plotted against the original data.(Figure 4, Appendix E) Although ANOVA analysis did not characterize emitter classification as significant, the graph clearly indicates a need to split by emitter classification.

5.2.3a Normal Emitters - Local cycle

ANOVA was performed on a sample containing only vehicles classified as normal emitters for CO. CO effect was looked at as a function of vehicle class, average speed, and CO base. From this analysis it was determined that average speed was not significant and that there is a significant difference between LDT1 and LDT2 (See Appendix D, Section K; Pairwise Comparison), but, due to the small sample size of LDT2, the two classes were combined. When analyzing the sample again with the two classes combined, initially the results indicate a significance between LDVs and LDTs. (See Appendix D, Section L; Test of Between-Subjects Effects) A more in depth look at the pairwise comparisons shows that there is no significant difference between LDVs and LDTs. (See Appendix D, Section L; Pairwise Comparison) Based on the pairwise comparisons, vehicle class was not considered as a factor for the analysis. The following equation was developed based on ANOVA results indicating CO base as a significant factor for CO effect, for all normal emitting vehicles on the Local cycle. (See Appendix D, Section M; Parameter Estimates)

CO Effect = 0.678 * (CO base); R² = .217

Figures 5 in Appendix E show the predicted A/C effect, based on the above equation, versus the original data.

5.2.3b High Emitters - Local Cycle

When looking at CO effect as a function of vehicle class, average speed, and CO base, ANOVA

results indicate that vehicle class and average speed are not significant for high emitting vehicles on the Local cycle. (See Appendix D, Sections N & O; Test of Between-Subjects Effects) However, CO base is considered significant and was used to develop the following linear equation that will model CO effect for all high emitting vehicles on the Local cycle. (See Appendix D, Section P; Parameter Estimates)

CO Effect = $0.119 * (CO base); R^2 = .852$

Figures 6 in Appendix E show the predicted A/C effect, based on the above equation, versus the original data.

5.3 <u>NOx</u>

There will be three equations in MOBILE6 used to model the A/C effect on NOx emissions for three different strata. Unlike CO and NMHC, these equations will be in log space. This section will describe the analysis used to develop these equations.

ANOVA was performed on the NOx data set with A/C effect as the independent variable and A/C base, average speed, vehicle class, and facility cycle as the factors. The conclusion from this analysis was that there was a significant difference between LDVs and LDTs and that the Ramp cycle should be analyzed separately. (See Appendix F, Section A; Test of Between-Subjects Effects & Pairwise Comparison, Ramp = #5)

5.3.1 LDV - Freeway, Arterial, Local

ANOVA was performed three separate times on a sample of LDVs with tests on all cycles excluding the Ramp cycle. For each ANOVA, A/C effect was the independent variable. The factors that were used varied for each analysis. The following are the combinations of factors used for the three ANOVA analyses.

NOx base, Average Speed
 Log (NOx base), Log (Average Speed)
 Log (NOx base + 1), Log (Average Speed)

Of the three analyses, the one using the factors listed as number three above had the best fit. (See Appendix F, Section B & C; Test of Between-Subjects Effects) The log function fits well because it is able to capture the drop in A/C effect at the lower end of the base emissions seen in the NOx sample. Log functions stabilize at the higher end of the base emissions, where a linear function would continue to rise. NOx base + 1 is used so that the log of a base emission equal to zero will be zero. Based on this analysis, log (NOx base + 1) was the only significant factor and was used to develop an equation to model A/C effect for LDVs. The following is the general equation form that was developed.

$$A/C Effect = x * Log (NOx base + 1)$$

Although the analysis results did not indicate average speed as a significant factor, it was decided to investigate whether there might be an interaction between average speed and base emissions. In order to do so, the data sample was divided into three separate speed bins: below 15 mph, between 15 mph and 31 mph, and above 31 mph. These speed bins were chosen to represent where the average speeds for the different cycles fall between. The equation form, noted above, was modeled for these three speed bins. This analysis showed a trend where the "x" term decreased as average speed increased. (See Appendix F, Section D; Test of Between-Subjects Effects) In order to capture this effect in the equation form above, the following steps were followed:

 If A/C Effect = x * Log (NOx base + 1) and
 If x = a + b (Log (Average Speed)), then
 A/C Effect = [a + b (Log (Average Speed))] * Log (NOx base + 1) = a Log (NOx base + 1) + b (Log (Average Speed) * Log (NOx base + 1))

When this equation form (3) was modeled for the three speed bins, both the "a" and "b" terms were deemed significant. (See Appendix F, Section E; Test of Between-Subjects Effects) The following equation was developed from this analysis to model NOx A/C effect for LDVs on all freeway, arterial, and local cycles.

A/C Effect = (4.867 Log (NOx base + 1) - 2.296 (Log (Average Speed)) * Log (NOx base + 1)); R² = 0.612

Figure 1 in Appendix G show the predicted A/C effect, based on the above equation, versus the original data.

5.3.2 LDT- Freeway, Arterial, Local

The analysis use for LDV, described above, was also performed on the sample of LDT with tests on all cycles, excluding the Ramp cycle. The analysis lead to similar conclusions for LDTs as LDVs; a interactive effect between average speed and base emissions. (See Appendix F, Sections F-H; Test of Between-Subjects Effects & Parameter Estimates) The following equation was developed from this analysis to model NOx A/C effect for LDTs on all freeway, arterial, and local cycles.

A/C Effect = (1.93 Log (NOx base + 1) - 0.769 (Log (Average Speed)) * Log (NOx base + 1)); R² = 0.371

Figures 2 in Appendix G show the predicted A/C effect, based on the above equation, versus the original data.

5.3.3 Ramp Cycle

ANOVA was performed on a sample of LDV and LDT with test on the Ramp cycle. For this analysis, A/C effect was looked at as a function of vehicle class and the log of NOx base + 1. Results indicate that there is no significant difference between LDVs and LDTs tested on the ramp cycle. (See Appendix F, Section I; Test of Between-Subjects Effects) Also, this analysis concluded that the log of NOx base + 1 is significant. Therefore the following equation was developed to model A/C effect for both LDVs and LDTs on the Ramp cycle. (See Appendix F, Section J; Test of Between-Subjects Effects)

A/C Effect = $0.655 * Log(NOx base + 1); R^2 = 0.342$

Figures 3 in Appendix G show the predicted A/C effect, based on the above equation, versus the original data.

6.0 VALIDATION

Results of this analysis were compared with initial results from the Coordinating Research Council (CRC) project E-37 investigating air conditioning emissions.⁹ The tests that were performed for this project were held in an environmental chamber, under several different ambient conditions. The models that are described in this report, EPA Report Number M6.ACE.002, "Air Conditioning Correction Factors," were used in conjunction with CRC's data. The purpose of doing this is to see how the models that were developed with data not from an environmental chamber compare to the data from environmental chamber testing. Though CRC performed tests under many different conditions, only the tests performed under conditions similar to what EPA and ATL were trying to simulate were used for comparison. Therefore, data from tests performed on the SCO3 driving cycle with the following conditions were used; 95°F, full solar load (850 watts/meter²), 100 grains water/ lb. dry-air, with the A/C on and off. Figures 1 - 4 in Appendix H show the comparison for several of the models. Considering the variation in CRC's data, the MOBILE6 model approach performs well on average.

7.0 START CORRECTION FACTORS

A primary change between MOBILE6 and MOBILE5 is the separation of FTP-based emissions into start and running components. This change draws a distinction between start emissions and emissions over start driving. Running emissions will represent not only emissions over warmed-up operation, but the baseline emissions inherent in start driving; start emissions will be defined as the incremental emission increase above this baseline which occurs during start driving. Total emissions over start driving, therefore, will be comprised of the baseline running emissions plus

⁹ Draft Report, CRC Project E-37, "Effects of Air Conditioning on Regulated Emissions for In-Use Vehicles," Coordinating Research Council, Inc.

incremental start emissions. In terms of air conditioning correction factors, the running correction factors developed in Section 5 will carry over to start driving to the extent that start driving emissions are comprised of the baseline running component. The pertinent issue for start air conditioning correction factors is therefore whether an A/C impact exists on the incremental start component as well.

Data required to make this assessment based on the methodology used in the development of base start and running emission factors¹⁰ were not gathered as part of the air conditioning test program. An assessment was therefore made by analyzing the ratio for each pollutant over a cold start ST01 run with the A/C on and off, shown for relevant stratifications in Table 1 of Appendix I. The NOx and fuel consumption results indicate there is an increase over start driving due to air conditioning, but smaller (by 13% for LDV's, 7% for LDT's) than the impact over running operation at the average speed of the ST02 cycle (20.2 mph). It is presumed from this result that the NOx ratio observed over ST01 is attributable solely to the baseline running component, with no A/C-related increase occurring on the start increment. Based on this presumption, a NOx correction factor for the incremental start component is not proposed for MOBILE6.

HC and CO results vary somewhat, particularly across emitter class. Cold start HC and CO emissions are dominated by emissions incurred by startup enrichment. Under cold start enrichment the air-fuel ratio will likely not change due to air conditioner operation and/or increased engine load, so increased HC or CO emissions are not expected over the start component. It is therefore proposed that no A/C correction factor be applied to the HC or CO start components.

It is important to note that although air conditioning correction factors are not proposed for the start components of any pollutant, air conditioning emissions over start driving will be estimated by MOBILE6. Because the running correction factors are carried over to start driving, they will be applied to the extent running emissions contribute to overall start emissions. This will be true for all starts, including those following "intermediate" soak durations in which the engine and/or catalyst are partially warmed up. For the most part, the contribution of running emissions (and hence the influence of the running air conditioning correction factors) will become greater as the soak duration shortens.

8.0 BENEFITS OF THE SFTP REQUIREMENT

Increasing attention to the importance of off-cycle emissions led to the development of a new compliance procedure, known as the Supplemental Federal Test Procedure (SFTP). In addition to "off-cycle" emissions, the SFTP addresses emissions which are generated with the air conditioning on, which were also inadequately represented by the FTP. The SFTP requirements grew out of the 1990 Clean Air Act Amendments, which instructed EPA to review the existing

¹⁰ This methodology referred to is the separation of FTP emissions into Start and Running components as described in MOBILE6 Report No. M6.STE.002, "The Determination of Hot Running Emissions from FTP Bag Emissions"

procedures and revise them in whatever ways were necessary to make them more representative of actual in-use conditions. Developed in conjunction with the California Air Resources Board (ARB) and auto manufacturers, the SFTP requirement adds two additional certification cycles, and tailpipe standards associated with those cycles, to impose control of off-cycle (US06 cycle) and air conditioning emissions (SC03 cycle). The US06 is run with the vehicle in the hot stabilized condition; that is, with the vehicle fully warmed up to insure that the engine and catalytic converter have reached typical operating temperatures. The SC03 follows a 10-minute soak and is run with vehicle air conditioning (A/C) in operation or with an appropriate simulation of air-conditioning operation.

The assigned benefits of the SFTP rule will depend on whether a vehicle is a Tier 1 vehicle or a LEV. EPA and ARB promulgated separate requirements applying to these standard levels, and hence the benefits resulting from the rule must take into account the relative stringency of the EPA and ARB rules. Under NLEV, the Tier 1 rule will only apply to LDTs above 6000 pounds (LDT3s and LDT4s), which phase in to the SFTP requirement at 40 percent in 2002, 80 percent in 2003, and 100 percent in 2004.¹ These trucks will be allowed to certify to the Tier 1 SFTP standards until they begin phasing into the Tier 2 final standards in 2008, at which point they will be required to comply with the SFTP provisions under the Tier 2 rule discussed below.

For Tier 1 and interim Tier 2 LDT3s and LDT4s, the benefits derived in EPA's SFTP final rulemaking shown in Appendix J, Table 1 will be used directly in MOBILE6 (Post-SFTP CO air conditioning emissions are a special case, as discussed below). The percent reductions shown for the SFTP rule will be applied directly to the off-cycle adjustment to generate final off-cycle adjustments for SFTP-compliant vehicles.

A detailed derivation of these benefits are contained in the SFTP final rulemaking.² Because vehicles complying with the SFTP are just starting to enter the market, an assessment of SFTP benefit on the in-use fleet is not yet possible. We therefore consider the approach used in the EPA SFTP rule to be the best available.

Under NLEV, the ARB rule will apply to LEV LDVs and LDTs under 6,000 pounds (LDT1/2). The ARB rule contains NOx and HC certification standards which differ from EPA's both in terms of the relative stringency over the US06 and SC03 cycles, and the mileage at which a vehicle is required to show compliance. The percent reductions derived for EPA's Tier 1 ruletherefore cannot be applied directly to vehicles complying with the ARB standards.

LEV SFTP benefits for HC are estimated to be 100 percent. This is because ARB has required the elimination of "commanded enrichment" when the air conditioner is used, which we expect will eradicate excess HC emissions due to air conditioning usage. Although this same provision will reduce CO as well, we are setting the post-SFTP emission level so that CO emissions with the air conditioner on are higher than without the air conditioner off by the amount of additional fuel consumed. This reflects the fact that although we expect excess CO emission resulting from commanded enrichment to be eliminated, the SFTP does not address the unavoidable load (and

hence fuel consumption) increase that results from air conditioner usage. An analysis presented in the draft version of this report (published in March 1998) estimated the percentage increase in fuel consumption with the air conditioning on as a function of speed; these equations were adopted directly for calculating a multiplicative adjustment which, when applied to running CO emissions without air conditioning, will result in post-SFTP CO emissions accounting for the "full-usage" air conditioning effect. These equations are as follows:

Post-SFTP CO Correction Factor (LDV/LDT1) = 1.34 -0.006134(speed)+0.000053(speed)² Post-SFTP CO Correction Factor (LDT2/3/4) = 1.27 -0.004939(speed)+0.000048(speed)²

For estimating post-SFTP NOx air conditioning emissions, we developed a methodology which estimated the percent reductions in NOx for the ARB standards on LEVs based on the EPA Tier 1 benefits presented in Table 1. This methodology required an assessment of the relative stringency of the EPA and ARB SFTP standards compared to their respective FTP standard. Several factors added complication to this analysis: first, the ARB standards are applicable at 4,000 miles whereas the EPA standards are applicable at 50,000 miles and full useful life (100/120K miles); second, the SFTP standards are expressed at NMHC+NOx, while MOBILE treats these pollutants separately. Third, the SFTP standards are based on operation when the vehicle is warmed-up, necessitating that the warmed-up component of the FTP be extracted in order to performing comparisons with the SFTP standards. An analytical step was required to address each of these factors.

Reductions in air conditioning emissions due to ARB's LEV SFTP standards for NOx were estimated through a determination of the stringency of the ARB and EPA SC03 standards. The stringency of the ARB and EPA standards is characterized by how well they control air conditioning emissions for LEVs and Tier 1 vehicles, respectively. This stringency was determined through a direct comparison between these standards and emissions over the FTP. The basis for this determination was a comparison between the SC03 standards and an estimation of "running certification levels" (i.e. the running component of FTP certification levels) calculated for Tier 1 vehicles and LEVs, according to the following steps, shown in Table J-2:

 Average certification emissions for model year 1999 LDVs and LDTs were generated from EPA's CFEIS database at 4,000 miles for LEVs and 50,000 miles for Tier 1 (Row
 The certification database used to generate these averages are provided with this report.

2) "Running certification levels" were estimated for Tier 1 and LEV by multiplying the certification levels from Step 2 by the appropriate running BER fractions discussed in Draft Final MOBILE6 Report M6.EXH.007 (December 1999); 0.90 for NOx and 0.23 for HC. The FTP certification levels and the derived "running certification levels" are shown in Row 2.

3) NMHC+NOx US06 and SC03 standards were split into separate NMHC and NOx

standards by applying a split of 0.14/0.86 for NMHC/NOx, derived from the development of EPA's Tier 1 standards, and discussed in EPA's final SFTP rule (Rows 3 and 4).

4) A ratio of the resulting 50,000 mile SFTP NMHC and NOx "standards" from Step 3 and the running certification levels from Step 2 were calculated for both the Tier 1 (EPA) and LEV(ARB) requirements for US06 (Row 5). The ratio (R) represents the magnitude of increase allowed between the FTP and US06 cycles, and hence represents the stringency of the SFTP standard relative to the FTP standards.

5) The stringency of the ARB standards relative to the EPA standards were estimated by comparing the value of R calculated in Step 4, according to the following equation (Row 6):

Additional Stringency of ARB Standards (%) = $[(R_{EPA} - 1) - (R_{ARB} - 1)] / (R_{EPA} - 1)$

The additional stringency represents the additional off-cycle emissions which would be eliminated above and beyond the reductions under the Tier 1 standards.

6) Benefits under the ARB rule were then derived by adjusting the Tier 1 benefits (Row 7) from Table 7-1 according to the additional stringency contained in Step 5, according to the following equation (Row 8):

ARB Benefit (%) = EPA Benefit + (Step 5) * (1 - EPA Benefit)

The resulting NOx SFTP benefits for LEVs are presented in Tables J-3. Full-usage air conditioning correction factors which reflect the SFTP rule are calculated in MOBILE6 by first estimating the additive NOx air conditioning increment without the SFTP using the methodology presented in Section 5, and reducing this increment by the appropriate percent reduction shown in Table J-3.

ACKNOWLEDGMENTS

Several individuals contributed considerable time and resources to gathering and analyzing the data presented here. Carl Fulper, Carl Scarbro, Dave Boshenek and Manish Patel of OTAQ designed and implemented the test program and developed the attendant data set. Steve Baldus and Kevin Cullen of GM made GM's environmental chamber available and coordinated testing at that facility.

Appendix A: Testing Vehicles, Cycles, and Correlation Results

Site	Year	Vehicle	Class	Fuel	Std	Emit*
ATL	91	CHEVROLET CAVALIER	LDV	TBI	Tier 0	N/N/N
ATL	91	FORD ECONOLINE 150	LDT2	PFI	Tier 0	H/H/N
ATL	91	FORD ESCORT	LDV	PFI	Tier 0	H/N/H
ATL	91	PLYMOUTH VOYAGER	LDT1	TBI	Tier 0	N/N/N
ATL	91	CHEVROLET ASTRO VAN	LDT1	TBI	Tier 0	H/N/N
ATL	93	CHEVROLET CORSICA	LDV	PFI	Tier 0	N/N/N
ATL	93	CHEVROLET S10	LDT1	TBI	Tier 0	N/N/N
ATL	93	TOYOTA CAMRY	LDV	PFI	Tier 0	N/N/N
ATL	93	HONDA ACCORD	LDV	PFI	Tier 0	N/N/N
ATL	90	NISSAN MAXIMA	LDV	PFI	Tier 0	N/N/N
ATL	93	EAGLE SUMMIT	LDV	PFI	Tier 0	N/N/N
EPA	92	TOYOTA COROLLA	LDV	PFI	Tier 0	N/N/N
EPA	96	HONDA ACCORD	LDV	PFI	Tier 1	N/N/N
EPA	92	SATURN SL	LDV	TBI	Tier 0	N/N/N
EPA	92	CHEVROLET BERETTA	LDV	PFI	Tier 0	H/H/N
EPA	94	FORD F150	LDT2	PFI	Tier 0	N/N/N
EPA	96	FORD F150	LDT2	PFI	Tier 1	N/N/N
EPA	92	MAZDA PROTEGE	LDV	PFI	Tier 0	N/N/N
EPA	96	CHEVROLET LUMINA	LDV	PFI	Tier 1	N/N/N
EPA	92	CHEVROLET CAVALIER	LDV	PFI	Tier 0	N/N/N
EPA	96	FORD RANGER	LDT1	PFI	Tier 1	N/N/N
EPA	90	JEEP CHEROKEE	LDT1	PFI	Tier 0	H/H/H
EPA	90	CHEVROLET SUBURBAN	LDT2	TBI	Tier 0	N/N/N
EPA	94	CHRYSLER LHS	LDV	PFI	Tier 0	N/N/N
EPA	96	HONDA CIVIC	LDV	PFI	Tier 1	N/N/N
EPA	94	CHEVROLET ASTRO VAN	LDT1	PFI	Tier 0	N/N/N
EPA	94	SATURN SL	LDV	PFI	Tier 0	N/N/N
EPA	94	HYUNDAI ELAN	LDV	PFI	Tier 0	N/N/N
EPA	92	CHEVROLET LUMINA VAN	LDT1	PFI	Tier 0	N/N/N
EPA	94	FORD ESCORT	LDV	PFI	Tier 1	N/N/N
EPA	90	PLYMOUTH VOYAGER	LDT1	PFI	Tier 0	N/N/N
EPA	92	CHEVROLET LUMINA	LDV	PFI	Tier 0	N/N/N
EPA	96	FORD EXPLORER	LDT1	PFI	Tier 1	N/N/N
EPA	94	PONTIAC TRANSPORT	LDT1	PFI	Tier 1	N/N/N
EPA	96	TOYOTA CAMRY	LDV	PFI	Tier 1	N/N/N
EPA	90	DODGE DYNASTY	LDV	PFI	Tier 0	N/N/N
BOTH	96	PONTIAC GRAND PRIX	LDV	PFI	Tier 1	N/N/N

 Table 1 - Vehicle Sample

*HC/CO/NOx

Cycle	Description	Distance (miles)	Average Speed (mph)	Max Speed (mph)	Max Accel (mph/sec)
NYCC	New York City Cycle	1.18	7.1	27.7	6.0
LOCL	Local Roadways	7.24	12.9	38.3	3.7
ARTE	Arterial Level Of Service E-F	1.62	11.6	39.9	5.8
ARTC	Arterial LOS C-D	3.35	19.2	49.5	5.7
ARTA	Arterial LOS A-B	5.06	24.7	58.9	5.0
FWYG	Freeway LOS G	1.42	13.1	35.7	3.8
FWYF	Freeway LOS F	2.28	18.6	49.9	6.9
FWYE	Freeway LOS E	3.85	30.5	63.0	5.3
FWYD	Freeway LOS D	5.95	52.9	70.6	2.3
FWAC	Freeway LOS A-C	8.54	59.7	73.1	3.4
FWHS	Freeway High Speed	10.70	63.2	74.7	2.7
RAMP	Freeway Ramp	2.56	34.7	60.2	5.7
AREA	Non-Freeway Area-Wide	7.25	19.4	52.3	6.4
LA92	California "Unified" Cycle	9.81	24.6	67.2	6.9
ST01	Start Cycle	1.39	20.2	41.0	5.1

 Table 2 - Test Cycles

		I	NMHO	C		CO			NOx		(Carbo	n
		Off	On	Ratio	Off	On	Ratio	Off	On	Ratio	Off	On	Ratio
NYCC	ATL	0.07	0.67	9.39	1.36	4.34	3.19	0.03	0.33	10.20	214.1	281.6	1.31
nice	EPA	0.07	0.07	1.03	0.98	3.32	3.39	0.11	0.25	2.15	208.6	275.4	1.32
	GM	0.06	0.07	1.25	0.60	7.71	12.94	0.11	0.28	2.52	217.8	283.5	1.30
LA92	ATL	0.04	0.10	2.76	0.39	7.92	20.35	0.38	0.21	0.55	115.3	138.7	1.20
LA92	EPA	0.02	0.02	0.94	0.15	0.53	3.52	0.38	0.51	1.34	110.1	133.0	1.21
	GM	0.04	0.03	0.61	0.54	1.83	3.37	0.67	1.04	1.55	216.8	267.2	1.23
FWHS	ATL	0.08	1.32	15.72	2.82	100.04	35.47	0.25	0.03	0.12	88.2	120.7	1.37
гулэ	EPA	0.05	1.33	24.23	4.63	112.24	24.26	0.22	0.00	0.01	82.7	120.0	1.45
	GM	0.02	0.03	1.75	0.82	2.41	2.94	0.30	0.62	2.05	82.0	85.9	1.05
ARTC	ATL	0.04	0.04	1.11	1.70	1.41	0.83	0.11	0.16	1.48	120.0	145.3	1.21
AKIC	EPA	0.03	0.05	1.48	1.41	3.00	2.13	0.13	0.28	2.14	116.7	144.4	1.24
	GM	0.01	0.03	2.83	0.33	2.99	9.15	0.19	0.37	1.94	120.2	144.5	1.20

Table 3 - Correlation Vehicle Emission Results (g/mi)

 Table 4 - Correlation Vehicle Compressor Behavior

		Compressor Fraction	Average High Pressure (lb/in ²)	Average Low Pressure (lb/in ²)
	ATL	1.00	311.5	49.7
NYCC	EPA	0.99	306.4	58.1
	GM	0.97	320.9	44.5
	ATL	0.99	334.2	48.2
LA92	EPA	0.97	339.4	57.9
	GM	0.99	312.1	40.3
	ATL	1.00	361.1	43.7
FWHS	EPA	0.99	367.3	50.3
	GM	1.02	264.8	34.3
	ATL	1.00	310.7	46.4
ARTC	EPA	0.98	315.3	54.7
	GM	0.99	310.8	39.0

Appendix B: NMHC ANOVA Results

SECTION A NMHC Univariate Analysis of Variance LDV & LDT All Emitter Categories All Cycles

Between-Subjects Factors

		N
CYCLE_ID	ART	148
	FWY	221
	LA92	37
	LOCAL	74
	RAMP	37
CLASS	LDT	182
	LDV	335

Tests of Between-Subjects Effects

Dependent Variable: NMHC_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	156.576 ^a	9	17.397	70.033	.000
CYCLE_ID	1.486	4	.372	1.496	.202
NMHC_EMT	51.228	1	51.228	206.216	.000
AVG_SPD	.213	1	.213	.859	.355
NMHC_OFF	138.427	1	138.427	557.236	.000
CLASS	.145	1	.145	.585	.445
Error	126.196	508	.248		
Total	282.771	517			

a. R Squared = .554 (Adjusted R Squared = .546)

Estimated Marginal Means

1. CYCLE_ID

Estimates

Dependent Variable: NMHC_DIFF

			95% Confidence Interval	
			Lower	Upper
CYCLE_ID	Mean	Std. Error	Bound	Bound
ART	9.934E-03 ^a	.044	-7.706E-02	9.692E-02
FWY	7.662E-02 ^a	.039	-6.782E-04	.154
LA92	1.276E-02 ^a	.082	149	.175
LOCAL	.161 ^a	.065	3.256E-02	.290
RAMP	-1.808E-02 ^a	.083	181	.145

a. Evaluated at covariates appeared in the model: nmhc emit cat = 7.930E-02, AVG_SPD = 27.95300, NMHC_OFF = .58475.

Pairwise Comparisons

Dependent Variable: NMHC_DIFF

		Mean			95% Confidence Interval for Difference ^a	
		Difference	o	o : a	Lower	Upper
(I) CYCLE_ID	(J) CYCLE_ID	(I-J)	Std. Error	Sig. ^a	Bound	Bound
ART	FWY	-6.668E-02	.063	.292	191	5.739E-02
	LA92	-2.823E-03	.092	.976	184	.178
	LOCAL	151*	.073	.037	294	-8.819E-03
	RAMP	2.801E-02	.095	.769	159	.215
FWY	ART	6.668E-02	.063	.292	-5.739E-02	.191
	LA92	6.386E-02	.092	.488	117	.244
	LOCAL	-8.463E-02	.083	.309	248	7.851E-02
	RAMP	9.470E-02	.089	.287	-8.002E-02	.269
LA92	ART	2.823E-03	.092	.976	178	.184
	FWY	-6.386E-02	.092	.488	244	.117
	LOCAL	148	.103	.151	352	5.453E-02
	RAMP	3.084E-02	.117	.792	199	.261
LOCAL	ART	.151*	.073	.037	8.819E-03	.294
	FWY	8.463E-02	.083	.309	-7.851E-02	.248
	LA92	.148	.103	.151	-5.453E-02	.352
	RAMP	.179	.108	.098	-3.350E-02	.392
RAMP	ART	-2.801E-02	.095	.769	215	.159
	FWY	-9.470E-02	.089	.287	269	8.002E-02
	LA92	-3.084E-02	.117	.792	261	.199
	LOCAL	179	.108	.098	392	3.350E-02

Based on estimated marginal means

*. The mean difference is significant at the .05 level.

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: NMHC_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	1.486	4	.372	1.496	.202
Error	126.196	508	.248		

The F tests the effect of CYCLE_ID. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

2. CLASS

Estimates

Dependent Variable: NMHC_DIFF

			95% Confide	ence Interval
			Lower	Upper
CLASS	Mean	Std. Error	Bound	Bound
LDT	3.016E-02 ^a	.042	-5.227E-02	.113
LDV	6.683E-02 ^a	.033	2.050E-03	.132

 Evaluated at covariates appeared in the model: nmhc emit cat = 7.930E-02, AVG_SPD = 27.95300, NMHC_OFF = .58475.

Pairwise Comparisons

Dependent Variable: NMHC_DIFF

		Mean			95% Confide for Diffe	<u> </u>
(I) CLASS	(J) CLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT	LDV	-3.667E-02	.048	.445	131	5.751E-02
LDV	LDT	3.667E-02	.048	.445	-5.751E-02	.131

Based on estimated marginal means

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: NMHC_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	.145	1	.145	.585	.445
Error	126.196	508	.248		

The F tests the effect of CLASS. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

SECTION B NMHC Univariate Analysis of Variance LDV & LDT All cycles Normal emitter only

Between-Subjects Factors

		N
CYCLE_ID	ART	128
	FWY	192
	LA92	32
	LOCAL	64
	RAMP	32
CLASS	LDT	140
	LDV	308

Tests of Between-Subjects Effects

Dependent Variable: NMHC_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	1.943 ^a	8	.243	4.722	.000
NMHC_OFF	7.789E-05	1	7.789E-05	.002	.969
AVG_SPD	7.479E-02	1	7.479E-02	1.454	.229
CYCLE_ID	.732	4	.183	3.555	.007
CLASS	4.724E-02	1	4.724E-02	.918	.338
Error	22.638	440	5.145E-02		
Total	24.582	448			

a. R Squared = .079 (Adjusted R Squared = .062)

Estimated Marginal Means

1. CYCLE_ID

Estimates

Dependent Variable: NMHC_DIFF

			95% Confidence Interval		
CYCLE_ID	Mean	Std. Error	Lower Bound	Upper Bound	
ART	2.136E-02 ^a	.022	-2.156E-02	6.429E-02	
FWY	3.242E-02 ^a	.019	-5.649E-03	7.050E-02	
LA92	1.977E-02 ^a	.040	-5.973E-02	9.927E-02	
LOCAL	.152 ^a	.032	8.809E-02	.216	
RAMP	4.676E-02 ^a	.041	-3.360E-02	.127	

a. Evaluated at covariates appeared in the model: NMHC_OFF = .12027, AVG_SPD = 28.01429.

Pairwise Comparisons

Dependent Variable: NMHC_DIFF

		Mean			95% Confidence Interval for Difference ^a	
		Difference		- 9	Lower	Upper
(I) CYCLE_ID	(J) CYCLE_ID	(I-J)	Std. Error	Sig. ^a	Bound	Bound
ART	FWY	-1.106E-02	.031	.721	-7.180E-02	4.967E-02
	LA92	1.595E-03	.045	.972	-8.701E-02	9.020E-02
	LOCAL	130*	.036	.000	201	-6.017E-02
	RAMP	-2.540E-02	.047	.588	117	6.670E-02
FWY	ART	1.106E-02	.031	.721	-4.967E-02	7.180E-02
	LA92	1.266E-02	.045	.779	-7.578E-02	.101
	LOCAL	119*	.041	.004	200	-3.919E-02
	RAMP	-1.433E-02	.044	.743	100	7.161E-02
LA92	ART	-1.595E-03	.045	.972	-9.020E-02	8.701E-02
	FWY	-1.266E-02	.045	.779	101	7.578E-02
	LOCAL	132*	.051	.010	232	-3.219E-02
	RAMP	-2.699E-02	.058	.639	140	8.610E-02
LOCAL	ART	.130*	.036	.000	6.017E-02	.201
	FWY	.119*	.041	.004	3.919E-02	.200
	LA92	.132*	.051	.010	3.219E-02	.232
	RAMP	.105*	.053	.048	9.523E-04	.209
RAMP	ART	2.540E-02	.047	.588	-6.670E-02	.117
	FWY	1.433E-02	.044	.743	-7.161E-02	.100
	LA92	2.699E-02	.058	.639	-8.610E-02	.140
	LOCAL	105*	.053	.048	209	-9.523E-04

Based on estimated marginal means

*. The mean difference is significant at the .05 level.

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: NMHC_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	.732	4	.183	3.555	.007
Error	22.638	440	5.145E-02		

The F tests the effect of CYCLE_ID. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

2. CLASS

Estimates

Dependent Variable: NMHC_DIFF

			95% Confidence Interval		
			Lower	Upper	
CLASS	Mean	Std. Error	Bound	Bound	
LDT	4.328E-02 ^a	.021	1.576E-03	8.499E-02	
LDV	6.557E-02 ^a	.016	3.488E-02	9.626E-02	

a. Evaluated at covariates appeared in the model: NMHC_OFF = .12027, AVG_SPD = 28.01429.

Pairwise Comparisons

Dependent Variable: NMHC_DIFF

		Mean			95% Confidence Interval for Difference ^a	
(I) CLASS	(J) CLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT	LDV	-2.229E-02	.023	.338	-6.800E-02	2.343E-02
LDV	LDT	2.229E-02	.023	.338	-2.343E-02	6.800E-02

Based on estimated marginal means

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: NMHC_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	4.724E-02	1	4.724E-02	.918	.338
Error	22.638	440	5.145E-02		

The F tests the effect of CLASS. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

SECTION C NMHC Univariate Analysis of Variance No Local Cycle LDV and LDT Normal Emitters

Between-Subjects Factors

		N
CLASS	LDT	120
	LDV	264

Tests of Between-Subjects Effects

Dependent Variable: NMHC_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	.870 ^a	4	.218	5.947	.000
NMHC_OFF	.125	1	.125	3.412	.066
AVG_SPD	.113	1	.113	3.079	.080
CLASS	.109	2	5.468E-02	1.495	.226
Error	13.902	380	3.658E-02		
Total	14.772	384			

a. R Squared = .059 (Adjusted R Squared = .049)

Estimated Marginal Means

CLASS

Estimates

Dependent Variable: NMHC_DIFF

			95% Confidence Interval		
			Lower Upper		
CLASS	Mean	Std. Error	Bound	Bound	
LDT	1.546E-02 ^a	.018	-1.897E-02	4.989E-02	
LDV	4.539E-02 ^a	.012	2.221E-02	6.856E-02	

a. Evaluated at covariates appeared in the model: NMHC_OFF = .10894, AVG_SPD = 31.01667.

Pairwise Comparisons

Dependent Variable: NMHC_DIFF

		Mean			95% Confide for Diffe	ence Interval erence ^a
(I) CLASS	(J) CLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT	LDV	-2.992E-02	.021	.158	-7.150E-02	1.166E-02
LDV	LDT	2.992E-02	.021	.158	-1.166E-02	7.150E-02

Based on estimated marginal means

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: NMHC_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	7.325E-02	1	7.325E-02	2.002	.158
Error	13.902	380	3.658E-02		

The F tests the effect of CLASS. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

SECTION D NMHC Univariate Analysis of Variance LDT and LDV together Normal emitters No Local Cycle

Tests of Between-Subjects Effects

Dependent Variable: NMHC_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	.761 ^a	2	.380	10.373	.000
NMHC_OFF	.108	1	.108	2.945	.087
AVG_SPD	.736	1	.736	20.076	.000
Error	14.011	382	3.668E-02		
Total	14.772	384			

a. R Squared = .052 (Adjusted R Squared = .047)

SECTION E NMHC Univariate Analysis of Variance Normal emitters only All Vehicle Classes No Local Cycle

Tests of Between-Subjects Effects

Dependent Variable: NMHC_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	.653 ^a	1	.653	17.710	.000
AVG_SPD	.653	1	.653	17.710	.000
Error	14.119	383	3.686E-02		
Total	14.772	384			

a. R Squared = .044 (Adjusted R Squared = .042)

Parameter Estimates

Dependent Variable: NMHC_DIFF

					95% Confide	ence Interval
Parameter	В	Std. Error	t	Sig.	Lower Bound	Upper Bound
AVG_SPD	1.162E-03	.000	4.208	.000	6.193E-04	1.705E-03

SECTION F

NMHC Univariate Analysis of Variance All Vehicle Classes Normal Emitters only Local Cycle only

Between-Subjects Factors

		N
VEHCLASS	LDT1	14
	LDT2	6
	LDV	44

Tests of Between-Subjects Effects

Dependent Variable: NMHC_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	2.725 ^a	5	.545	4.538	.001
VEHCLASS	1.201	3	.400	3.333	.025
NMHC_OFF	4.981E-02	1	4.981E-02	.415	.522
AVG_SPD	2.129E-02	1	2.129E-02	.177	.675
Error	7.085	59	.120		
Total	9.810	64			

a. R Squared = .278 (Adjusted R Squared = .217)

Estimated Marginal Means

VEHCLASS

Estimates

Dependent Variable: NMHC_DIFF

			95% Confidence Interval		
VEHCLASS	Mean	Std. Error	Lower Bound	Upper Bound	
LDT1	-5.315E-03 ^a	.093	191	.180	
LDT2	.547 ^a	.149	.249	.844	
LDV	.128 ^a	.053	2.285E-02	.233	

a. Evaluated at covariates appeared in the model: NMHC_OFF = .18830, AVG_SPD = 10.00000.

Pairwise Comparisons

Dependent Variable: NMHC_DIFF

		Mean			95% Confide for Diffe	ence Interval erence ^a
(I) VEHCLASS	(J) VEHCLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT1	LDT2	552*	.175	.003	903	201
	LDV	133	.106	.215	346	7.963E-02
LDT2	LDT1	.552*	.175	.003	.201	.903
	LDV	.419*	.159	.011	9.992E-02	.737
LDV	LDT1	.133	.106	.215	-7.963E-02	.346
	LDT2	419*	.159	.011	737	-9.992E-02

Based on estimated marginal means

*. The mean difference is significant at the .05 level.

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: NMHC_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	1.194	2	.597	4.970	.010
Error	7.085	59	.120		

The F tests the effect of VEHCLASS. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

SECTION G NMHC Univariate Analysis of Variance LDV & LDT Local Cycle only Normal Emitters only

Between-Subjects Factors

		Ν
CLASS	LDT	20
	LDV	44

Tests of Between-Subjects Effects

Dependent Variable: NMHC_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	1.535 ^a	4	.384	2.782	.035
NMHC_OFF	.282	1	.282	2.043	.158
AVG_SPD	6.065E-02	1	6.065E-02	.440	.510
CLASS	1.080E-02	2	5.398E-03	.039	.962
Error	8.275	60	.138		
Total	9.810	64			

a. R Squared = .156 (Adjusted R Squared = .100)

SECTION G cont. NMHC Univariate Analysis of Variance

Tests of Between-Subjects Effects

Dependent Variable: NMHC_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	1.524 ^a	2	.762	5.702	.005
NMHC_OFF	.354	1	.354	2.650	.109
AVG_SPD	.276	1	.276	2.063	.156
Error	8.286	62	.134		
Total	9.810	64			

a. R Squared = .155 (Adjusted R Squared = .128)

SECTION H NMHC Univariate Analysis of Variance LDV and LDT Normal Emitters Only Local Cycle Only

Tests of Between-Subjects Effects

Dependent Variable: NMHC_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	1.248 ^a	1	1.248	9.187	.004
NMHC_OFF	1.248	1	1.248	9.187	.004
Error	8.561	63	.136		
Total	9.810	64			

a. R Squared = .127 (Adjusted R Squared = .113)

Parameter Estimates

Dependent Variable: NMHC_DIFF

					95% Confidence Interval	
Deremeter	D	Std Error	4	Sia	Lower	Upper
Parameter	В	Std. Error	L	Sig.	Bound	Bound
NMHC_OFF	.506	.167	3.031	.004	.172	.839

SECTION I NMHC Univariate Analysis of Variance High Emitter only All Cycles All Vehicle Classes

Between-Subjects Factors

		N
VEHCLASS	LDT1	28
	LDT2	14
	LDV	27
CYCLE_ID	ART	20
	FWY	29
	LA92	5
	LOCAL	10
	RAMP	5

Tests of Between-Subjects Effects

Dependent Variable: NMHC_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	168.489 ^a	9	18.721	12.522	.000
NMHC_OFF	100.729	1	100.729	67.377	.000
AVG_SPD	1.098E-02	1	1.098E-02	.007	.932
VEHCLASS	17.928	2	8.964	5.996	.004
CYCLE_ID	4.098	4	1.025	.685	.605
Error	89.701	60	1.495		
Total	258.190	69			

a. R Squared = .653 (Adjusted R Squared = .600)

Estimated Marginal Means

1. VEHCLASS

Estimates

Dependent Variable: NMHC_DIFF

			95% Confidence Interval		
VEHCLASS	Mean	Std. Error	Lower Bound	Upper Bound	
LDT1	.418 ^a	.272	125	.962	
LDT2	936 ^a	.348	-1.633	240	
LDV	.189 ^a	.284	379	.757	

a. Evaluated at covariates appeared in the model: NMHC_OFF = 3.60049, AVG_SPD = 27.55507.

Pairwise Comparisons

Dependent Variable: NMHC_DIFF

		Mean			95% Confidence Interval for Difference ^a	
(I) VEHCLASS	(J) VEHCLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT1	LDT2	1.355*	.405	.001	.545	2.164
	LDV	.229	.379	.548	530	.988
LDT2	LDT1	-1.355*	.405	.001	-2.164	545
	LDV	-1.125*	.423	.010	-1.971	280
LDV	LDT1	229	.379	.548	988	.530
	LDT2	1.125*	.423	.010	.280	1.971

Based on estimated marginal means

*. The mean difference is significant at the .05 level.

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: NMHC_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	17.928	2	8.964	5.996	.004
Error	89.701	60	1.495		

The F tests the effect of VEHCLASS. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

2. CYCLE_ID

Dependent Variable: NMHC_DIFF

			95% Confidence Interval	
CYCLE_ID	Mean	Std. Error	Lower Bound	Upper Bound
ART	244 ^a	.295	834	.345
FWY	.170 ^a	.266	361	.702
LA92	259 ^a	.550	-1.360	.841
LOCAL	.263 ^a	.440	617	1.142
RAMP	477 ^a	.555	-1.587	.633

a. Evaluated at covariates appeared in the model: NMHC_OFF = 3.60049, AVG_SPD = 27.55507.

Pairwise Comparisons

Dependent Variable: NMHC_DIFF

		Mean			95% Confidence Interva for Difference ^a	
		Difference		2	Lower	Upper
(I) CYCLE_ID	(J) CYCLE_ID	(I-J)	Std. Error	Sig. ^a	Bound	Bound
ART	FWY	415	.422	.330	-1.259	.429
	LA92	1.498E-02	.615	.981	-1.215	1.245
	LOCAL	507	.487	.302	-1.481	.467
	RAMP	.232	.637	.716	-1.041	1.506
FWY	ART	.415	.422	.330	429	1.259
	LA92	.430	.614	.486	798	1.657
	LOCAL	-9.244E-02	.559	.869	-1.210	1.025
	RAMP	.647	.594	.281	542	1.836
LA92	ART	-1.498E-02	.615	.981	-1.245	1.215
	FWY	430	.614	.486	-1.657	.798
	LOCAL	522	.693	.454	-1.909	.865
	RAMP	.218	.782	.782	-1.346	1.781
LOCAL	ART	.507	.487	.302	467	1.481
	FWY	9.244E-02	.559	.869	-1.025	1.210
	LA92	.522	.693	.454	865	1.909
	RAMP	.740	.727	.313	714	2.193
RAMP	ART	232	.637	.716	-1.506	1.041
	FWY	647	.594	.281	-1.836	.542
	LA92	218	.782	.782	-1.781	1.346
	LOCAL	740	.727	.313	-2.193	.714

Based on estimated marginal means

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: NMHC_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	4.098	4	1.025	.685	.605
Error	89.701	60	1.495		

The F tests the effect of CYCLE_ID. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

SECTION J NMHC Univariate Analysis of Variance High Emitters Only LDV & LDT All Cycles

Between-Subjects Factors

		N
CYCLE_ID	ART	20
	FWY	29
	LA92	5
	LOCAL	10
	RAMP	5
CLASS	LDT	42
	LDV	27

Tests of Between-Subjects Effects

Dependent Variable: NMHC_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	151.736 ^a	8	18.967	10.868	.000
NMHC_OFF	90.932	1	90.932	52.106	.000
CYCLE_ID	4.211	4	1.053	.603	.662
AVG_SPD	5.203E-06	1	5.203E-06	.000	.999
CLASS	1.175	1	1.175	.673	.415
Error	106.454	61	1.745		
Total	258.190	69			

a. R Squared = .588 (Adjusted R Squared = .534)

Estimated Marginal Means

1. CYCLE_ID

Dependent Variable: NMHC_DIFF

			95% Confidence Interval	
CYCLE_ID	Mean	Std. Error	Lower Bound	Upper Bound
ART	-4.725E-02 ^a	.317	681	.586
FWY	.358 ^a	.284	210	.925
LA92	-7.017E-02 ^a	.593	-1.256	1.115
LOCAL	.488 ^a	.477	466	1.443
RAMP	280 ^a	.598	-1.476	.915

a. Evaluated at covariates appeared in the model: NMHC_OFF = 3.60049, AVG_SPD = 27.55507.

Pairwise Comparisons

Dependent Variable: NMHC_DIFF

		Mean			95% Confidence Interva for Difference ^a	
		Difference		0	Lower	Upper
(I) CYCLE_ID	(J) CYCLE_ID	(I-J)	Std. Error	Sig. ^a	Bound	Bound
ART	FWY	405	.456	.378	-1.316	.507
	LA92	2.293E-02	.665	.973	-1.306	1.352
	LOCAL	536	.526	.313	-1.588	.516
	RAMP	.233	.688	.736	-1.142	1.609
FWY	ART	.405	.456	.378	507	1.316
	LA92	.428	.663	.521	898	1.753
	LOCAL	131	.604	.829	-1.338	1.076
	RAMP	.638	.642	.324	646	1.922
LA92	ART	-2.293E-02	.665	.973	-1.352	1.306
	FWY	428	.663	.521	-1.753	.898
	LOCAL	559	.749	.459	-2.056	.939
	RAMP	.210	.844	.804	-1.478	1.899
LOCAL	ART	.536	.526	.313	516	1.588
	FWY	.131	.604	.829	-1.076	1.338
	LA92	.559	.749	.459	939	2.056
	RAMP	.769	.785	.331	801	2.338
RAMP	ART	233	.688	.736	-1.609	1.142
	FWY	638	.642	.324	-1.922	.646
	LA92	210	.844	.804	-1.899	1.478
	LOCAL	769	.785	.331	-2.338	.801

Based on estimated marginal means

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: NMHC_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	4.211	4	1.053	.603	.662
Error	106.454	61	1.745		

The F tests the effect of CYCLE_ID. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

2. CLASS

Estimates

Dependent Variable: NMHC_DIFF

			95% Confidence Interval		
			Lower Upper		
CLASS	Mean	Std. Error	Bound	Bound	
LDT	-6.297E-02 ^a	.249	561	.435	
LDV	.242 ^a	.306	370	.854	

a. Evaluated at covariates appeared in the model: NMHC_OFF = 3.60049, AVG_SPD = 27.55507.

Pairwise Comparisons

Dependent Variable: NMHC_DIFF

		Mean			95% Confide for Diff	ence Interval erence ^a
(I) CLASS	(J) CLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT	LDV	305	.372	.415	-1.049	.439
LDV	LDT	.305	.372	.415	439	1.049

Based on estimated marginal means

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: NMHC_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	1.175	1	1.175	.673	.415
Error	106.454	61	1.745		

The F tests the effect of CLASS. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

SECTION K NMHC Univariate Analysis of Variance

High Emitters Only All Vehicle classes All Cycles

Tests of Between-Subjects Effects

Dependent Variable: NMHC_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	93.686 ^a	1	93.686	38.727	.000
NMHC_OFF	93.686	1	93.686	38.727	.000
Error	164.504	68	2.419		
Total	258.190	69			

a. R Squared = .363 (Adjusted R Squared = .353)

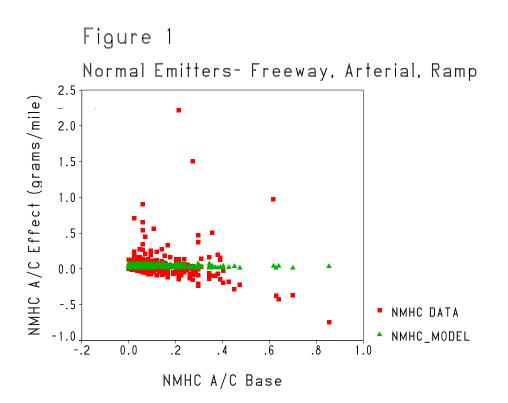
Parameter Estimates

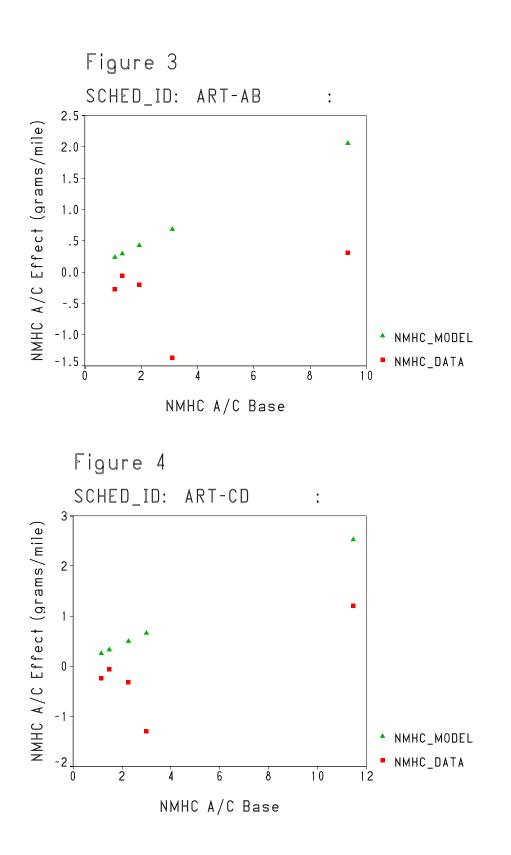
Dependent Variable: NMHC_DIFF

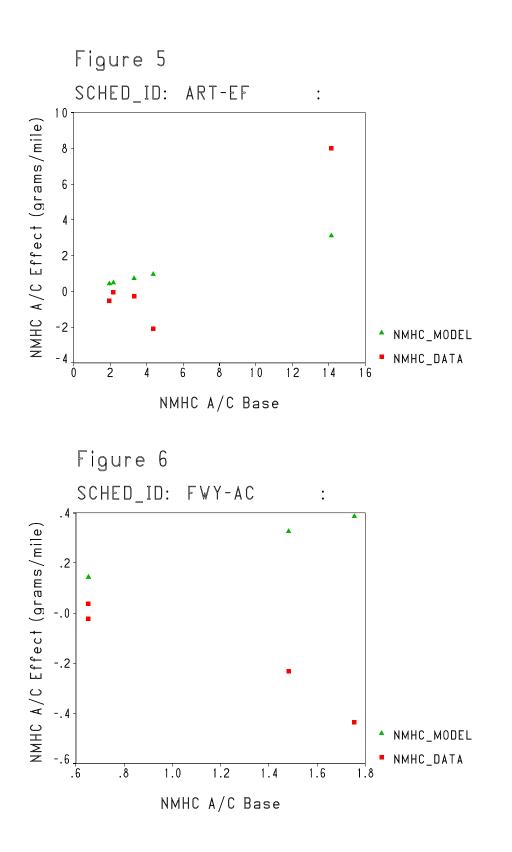
					95% Confide	ence Interval
Parameter	В	Std. Error	t	Sig.	Lower Bound	Upper Bound
NMHC_OFF	.220	.035	6.223	.000	.149	.290

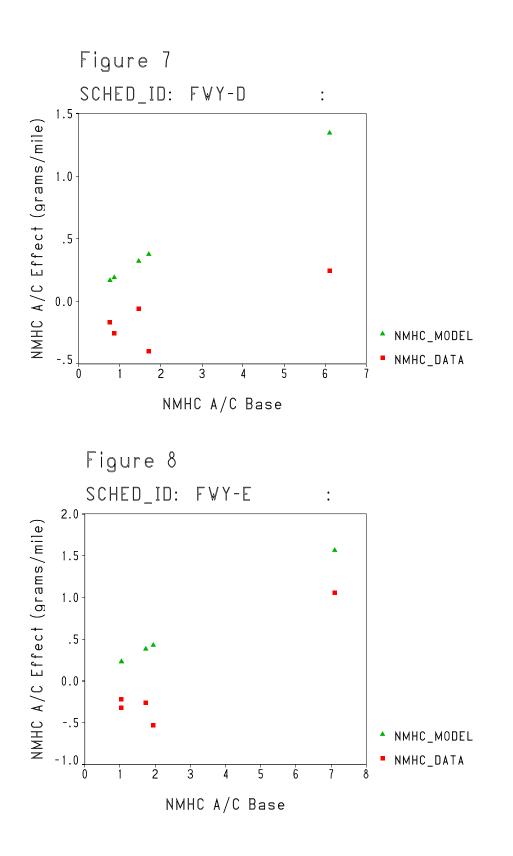
Appendix C: NMHC Graphs

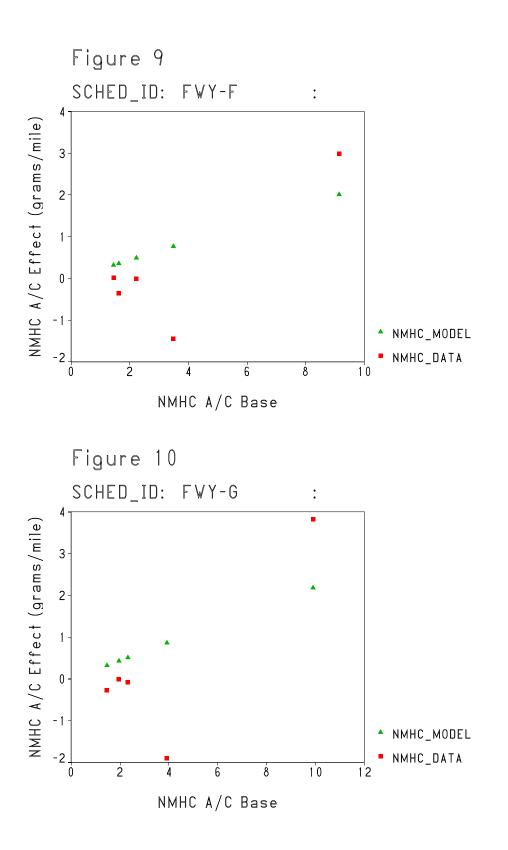
NMHC High Emitter Graphs

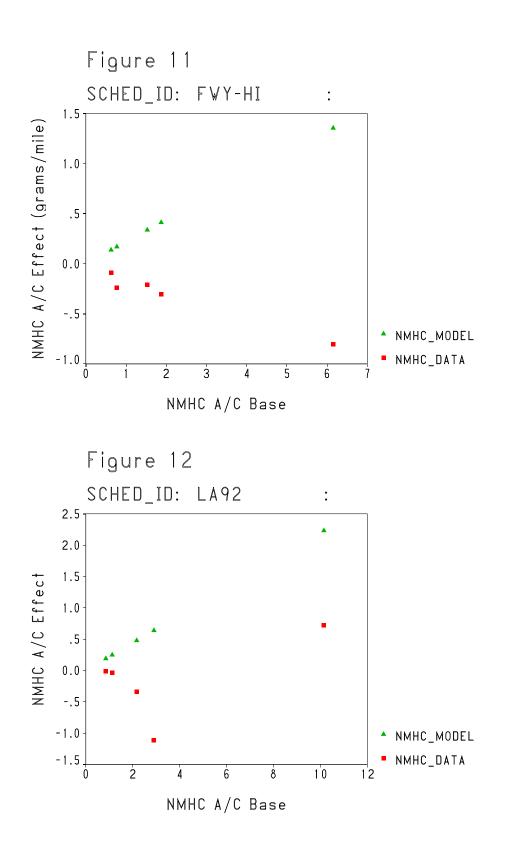


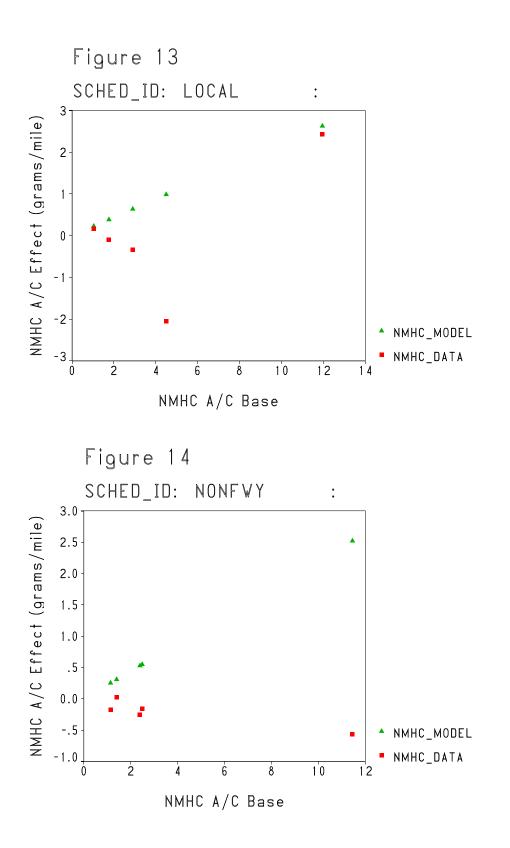


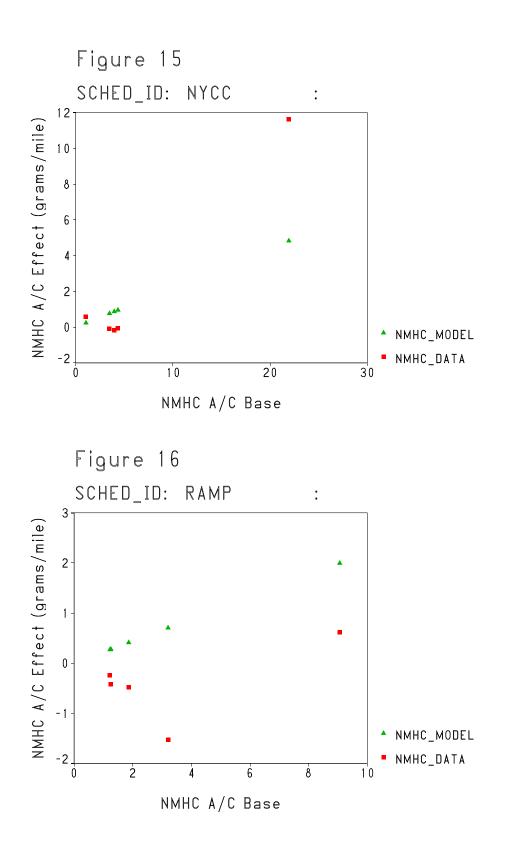












Appendix D: CO ANOVA Results

SECTION A CO Univariate Analysis of Variance All Veh. Classes All Cycles All Emitter Categories

Between-Subjects Factors

		Ν
CYCLE_ID	ART	148
	FWY	221
	LA92	37
	LOCAL	74
	RAMP	37
VEHCLASS	LDT1	126
	LDT2	56
	LDV	335

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

	Type III Sum of		Mean	_	
Source	Squares	df	Square	F	Sig.
Corrected Model	7114.230 ^a	9	790.470	4.268	.000
Intercept	797.635	1	797.635	4.307	.038
CYCLE_ID	1250.449	4	312.612	1.688	.151
CO_OFF	4653.597	1	4653.597	25.127	.000
AVG_SPD	93.187	1	93.187	.503	.478
COEM_CAT	2547.696	1	2547.696	13.756	.000
VEHCLASS	353.086	2	176.543	.953	.386
Error	93896.679	507	185.201		
Total	111971.495	517			
Corrected Total	101010.908	516			

a. R Squared = .070 (Adjusted R Squared = .054)

Estimated Marginal Means

1. CYCLE_ID

Dependent Variable: CO_DIFF

			95% Confidence Interval	
CYCLE_ID	Mean	Std. Error	Lower Bound	Upper Bound
ART	3.135 ^a	1.298	.586	5.684
FWY	4.018 ^a	1.174	1.712	6.325
LA92	2.532 ^a	2.300	-1.986	7.049
LOCAL	7.962 ^a	1.846	4.335	11.589
RAMP	4.820 ^a	2.313	.277	9.364

a. Evaluated at covariates appeared in the model: CO_OFF = 16.77908, AVG_SPD = 27.95300, COEM_CAT = 7.930E-02.

Pairwise Comparisons

Dependent Variable: CO_DIFF

		Mean			95% Confide for Diff	ence Interval erence ^a
		Difference	o	o : a	Lower	Upper
(I) CYCLE_ID	(J) CYCLE_ID	(I-J)	Std. Error	Sig. ^a	Bound	Bound
ART	FWY	883	1.724	.609	-4.271	2.504
	LA92	.604	2.515	.810	-4.338	5.545
	LOCAL	-4.827*	1.979	.015	-8.714	939
	RAMP	-1.685	2.603	.518	-6.799	3.428
FWY	ART	.883	1.724	.609	-2.504	4.271
	LA92	1.487	2.510	.554	-3.445	6.418
	LOCAL	-3.944	2.265	.082	-8.394	.506
	RAMP	802	2.430	.741	-5.576	3.972
LA92	ART	604	2.515	.810	-5.545	4.338
	FWY	-1.487	2.510	.554	-6.418	3.445
	LOCAL	-5.430	2.819	.055	-10.969	.108
	RAMP	-2.289	3.197	.474	-8.569	3.992
LOCAL	ART	4.827*	1.979	.015	.939	8.714
	FWY	3.944	2.265	.082	506	8.394
	LA92	5.430	2.819	.055	108	10.969
	RAMP	3.142	2.956	.288	-2.667	8.950
RAMP	ART	1.685	2.603	.518	-3.428	6.799
	FWY	.802	2.430	.741	-3.972	5.576
	LA92	2.289	3.197	.474	-3.992	8.569
	LOCAL	-3.142	2.956	.288	-8.950	2.667

Based on estimated marginal means

* The mean difference is significant at the .05 level.

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: CO_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	1250.449	4	312.612	1.688	.151
Error	93896.679	507	185.201		

The F tests the effect of CYCLE_ID. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

2. VEHCLASS

Estimates

Dependent Variable: CO_DIFF

			95% Confidence Interval		
			Lower	Upper	
VEHCLASS	Mean	Std. Error	Bound	Bound	
LDT1	3.372 ^a	1.314	.790	5.954	
LDT2	4.734 ^a	1.937	.929	8.539	
LDV	5.374 ^a	.901	3.604	7.144	

a. Evaluated at covariates appeared in the model: CO_OFF = 16.77908, AVG_SPD = 27.95300, COEM_CAT = 7.930E-02.

Pairwise Comparisons

Dependent Variable: CO_DIFF

		Mean			95% Confide for Diffe	ence Interval erence ^a
(I) VEHCLASS	(J) VEHCLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT1	LDT2	-1.362	2.211	.538	-5.707	2.983
	LDV	-2.002	1.450	.168	-4.851	.847
LDT2	LDT1	1.362	2.211	.538	-2.983	5.707
	LDV	640	2.052	.755	-4.671	3.391
LDV	LDT1	2.002	1.450	.168	847	4.851
	LDT2	.640	2.052	.755	-3.391	4.671

Based on estimated marginal means

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: CO_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	353.086	2	176.543	.953	.386
Error	93896.679	507	185.201		

The F tests the effect of VEHCLASS. This test is based on the linearly

independent pairwise comparisons among the estimated marginal means.

SECTION B CO Univariate Analysis of Variance No Local Cycle LDV & LDT All Emitter categories

Between-Subjects Factors

		N
CYCLE_ID	ART	148
	FWY	221
	LA92	37
	RAMP	37
CLASS	LDT	156
	LDV	287

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Corrected Model	1316.192 ^a	5	263.238	1.328	.251
Intercept	2454.833	1	2454.833	12.386	.000
CYCLE_ID	326.043	3	108.681	.548	.649
CO_OFF	167.178	1	167.178	.844	.359
CLASS	851.774	1	851.774	4.298	.039
Error	86609.227	437	198.190		
Total	95074.518	443			
Corrected Total	87925.419	442			

a. R Squared = .015 (Adjusted R Squared = .004)

Estimated Marginal Means

1. CYCLE_ID

Dependent Variable: CO_DIFF

			95% Confidence Interval	
CYCLE_ID	Mean	Std. Error	Lower Bound	Upper Bound
ART	2.723 ^a	1.176	.412	5.035
FWY	4.111 ^a	.969	2.206	6.016
LA92	2.316 ^a	2.324	-2.251	6.884
RAMP	5.191 ^a	2.325	.622	9.761

a. Evaluated at covariates appeared in the model: CO_OFF = 15.98205.

Pairwise Comparisons

Dependent Variable: CO_DIFF

		Mean			95% Confide for Diffe	
(I) CYCLE_ID	(J) CYCLE_ID	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
ART	FWY	-1.388	1.496	.354	-4.328	1.552
	LA92	.407	2.588	.875	-4.679	5.493
	RAMP	-2.468	2.588	.341	-7.555	2.619
FWY	ART	1.388	1.496	.354	-1.552	4.328
	LA92	1.795	2.501	.473	-3.121	6.710
	RAMP	-1.081	2.502	.666	-5.999	3.838
LA92	ART	407	2.588	.875	-5.493	4.679
	FWY	-1.795	2.501	.473	-6.710	3.121
	RAMP	-2.875	3.273	.380	-9.309	3.559
RAMP	ART	2.468	2.588	.341	-2.619	7.555
	FWY	1.081	2.502	.666	-3.838	5.999
	LA92	2.875	3.273	.380	-3.559	9.309

Based on estimated marginal means

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: CO_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	326.043	3	108.681	.548	.649
Error	86609.227	437	198.190		

The F tests the effect of CYCLE_ID. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

2. CLASS

Dependent Variable: CO_DIFF

			95% Confide	ence Interval
			Lower	Upper
CLASS	Mean	Std. Error	Bound	Bound
LDT	2.133 ^a	1.279	381	4.647
LDV	5.038 ^a	1.026	3.022	7.054

a. Evaluated at covariates appeared in the model: CO_OFF = 15.98205.

Pairwise Comparisons

Dependent Variable: CO_DIFF

		Mean			95% Confide for Diffe	ence Interval erence ^a
(I) CLASS	(J) CLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT	LDV	-2.905*	1.401	.039	-5.659	151
LDV	LDT	2.905*	1.401	.039	.151	5.659

Based on estimated marginal means

*. The mean difference is significant at the .05 level.

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: CO_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	851.774	1	851.774	4.298	.039
Error	86609.227	437	198.190		

The F tests the effect of CLASS. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

SECTION C CO Univariate Analysis of Variance Normal Emit No Local Cycle

CLASS = LDV

Tests of Between-Subjects Effects^b

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	11535.632 ^a	2	5767.816	46.774	.000
CO_OFF	4320.606	1	4320.606	35.038	.000
AVG_SPD	577.457	1	577.457	4.683	.031
Error	33787.462	274	123.312		
Total	45323.093	276			

a. R Squared = .255 (Adjusted R Squared = .249)

b. CLASS = LDV

Parameter Estimates^a

Dependent Variable: CO_DIFF

					95% Confide	ence Interval
Parameter	В	Std. Error	t	Sig.	Lower Bound	Upper Bound
CO_OFF	.815	.138	5.919	.000	.544	1.085
AVG_SPD	5.272E-02	.024	2.164	.031	4.759E-03	.101

a. CLASS = LDV

SECTION D CO Univariate Analysis of Variance Norm Emit LDT only No local

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	1798.456 ^a	1	1798.456	8.229	.005
AVG_SPD	1798.456	1	1798.456	8.229	.005
Error	28629.094	131	218.543		
Total	30427.550	132			

a. R Squared = .059 (Adjusted R Squared = .052)

Parameter Estimates

Dependent Variable: CO_DIFF

					95% Confide	ence Interval
Parameter	В	Std. Error	t	Sig.	Lower Bound	Upper Bound
AVG_SPD	.104	.036	2.869	.005	3.230E-02	.176

SECTION F

CO Univariate Analysis of Variance All Veh Classes High emitters only

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	10004.567 ^a	2	5002.283	11.871	.000
AVG_SPD	5948.248	1	5948.248	14.115	.001
CO_OFF	9361.556	1	9361.556	22.215	.000
Error	16434.569	39	421.399		
Total	26439.136	41			

a. R Squared = .378 (Adjusted R Squared = .347)

Parameter Estimates

Dependent Variable: CO_DIFF

					95% Confide	ence Interval
					Lower	Upper
Parameter	В	Std. Error	t	Sig.	Bound	Bound
AVG_SPD	462	.123	-3.757	.001	710	213
CO_OFF	9.863E-02	.021	4.713	.000	5.630E-02	.141

SECTION F CO Univariate Analysis of Variance High emitters only No Local Cycle Avg speed < 19

Between-Subjects Factors

		N
CLASS	LDT	6
	LDV	3

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	9718.115 ^a	4	2429.529	12.919	.008
CLASS	518.031	2	259.015	1.377	.334
CO_OFF	1.364	1	1.364	.007	.935
AVG_SPD	150.806	1	150.806	.802	.412
Error	940.329	5	188.066		
Total	10658.444	9			

a. R Squared = .912 (Adjusted R Squared = .841)

Estimated Marginal Means

CLASS

Estimates

Dependent Variable: CO_DIFF

			95% Confidence Interval		
			Lower Upper		
CLASS	Mean	Std. Error	Bound	Bound	
LDT	2.167 ^a	12.164	-29.101	33.435	
LDV	58.091 ^a	23.003	-1.040	117.223	

a. Evaluated at covariates appeared in the model: CO_OFF = 159.63389, AVG_SPD = 14.43333.

Pairwise Comparisons

Dependent Variable: CO_DIFF

		Mean			95% Confide for Diffe	ence Interval erence ^a
(I) CLASS	(J) CLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT	LDV	-55.925	33.816	.159	-142.853	31.003
LDV	LDT	55.925	33.816	.159	-31.003	142.853

Based on estimated marginal means

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: CO_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	514.350	1	514.350	2.735	.159
Error	940.329	5	188.066		

The F tests the effect of CLASS. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

SECTION G CO Univariate Analysis of Variance Avg. Speed < 19 mph All Veh. Classes

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	9200.084 ^a	2	4600.042	22.080	.001
CO_OFF	5780.609	1	5780.609	27.746	.001
AVG_SPD	337.690	1	337.690	1.621	.244
Error	1458.360	7	208.337		
Total	10658.444	9			

a. R Squared = .863 (Adjusted R Squared = .824)

SECTION H CO Univariate Analysis of Variance High emitters only No Local Cycle Avg. Speed < 19 All veh. class

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	8862.394 ^a	1	8862.394	39.475	.000
CO_OFF	8862.394	1	8862.394	39.475	.000
Error	1796.050	8	224.506		
Total	10658.444	9			

a. R Squared = .831 (Adjusted R Squared = .810)

Parameter Estimates

Dependent Variable: CO_DIFF

					95% Confide	ence Interval
Parameter	В	Std. Error	+	Sig.	Lower Bound	Upper Bound
1 arameter	ם		L	Siy.	Dound	Dound
CO_OFF	.154	.024	6.283	.000	9.738E-02	.210

SECTION I CO Univariate Analysis of Variance Local Cycle Only

All Veh. Classes All Emitter Categories

Between-Subjects Factors

		N
VEHCLASS	LDT1	18
	LDT2	8
	LDV	48

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	9881.026 ^a	6	1646.838	15.961	.000
VEHCLASS	1154.473	3	384.824	3.730	.015
AVG_SPD	76.562	1	76.562	.742	.392
CO_OFF	2276.352	1	2276.352	22.063	.000
COEM_CAT	48.846	1	48.846	.473	.494
Error	7015.951	68	103.176		
Total	16896.976	74			

a. R Squared = .585 (Adjusted R Squared = .548)

Estimated Marginal Means

VEHCLASS

Estimates

Dependent Variable: CO_DIFF

			95% Confidence Interval		
			Lower	Upper	
VEHCLASS	Mean	Std. Error	Bound	Bound	
LDT1	3.706 ^a	2.415	-1.114	8.525	
LDT2	13.979 ^a	3.741	6.514	21.443	
LDV	8.798 ^a	1.494	5.816	11.780	

a. Evaluated at covariates appeared in the model: AVG_SPD = 10.00000, CO_OFF = 21.55046, COEM_CAT = 8.108E-02.

Pairwise Comparisons

Dependent Variable: CO_DIFF

		Mean			95% Confidence Interval for Difference ^a	
(I) VEHCLASS	(J) VEHCLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT1	LDT2	-10.273*	4.382	.022	-19.018	-1.528
	LDV	-5.093	2.871	.081	-10.823	.637
LDT2	LDT1	10.273*	4.382	.022	1.528	19.018
	LDV	5.180	4.102	.211	-3.005	13.366
LDV	LDT1	5.093	2.871	.081	637	10.823
	LDT2	-5.180	4.102	.211	-13.366	3.005

Based on estimated marginal means

*. The mean difference is significant at the .05 level.

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: CO_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	644.113	2	322.057	3.121	.050
Error	7015.951	68	103.176		

The F tests the effect of VEHCLASS. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

Univariate Analysis of Variance

Between-Subjects Factors

		Ν
CLASS	LDT	26
	LDV	48

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	9314.064 ^a	5	1862.813	16.950	.000
AVG_SPD	80.405	1	80.405	.732	.395
CO_OFF	2074.928	1	2074.928	18.881	.000
COEM_CAT	9.007	1	9.007	.082	.776
CLASS	587.511	2	293.756	2.673	.076
Error	7582.912	69	109.897		
Total	16896.976	74			

a. R Squared = .551 (Adjusted R Squared = .519)

SECTION J CO Univariate Analysis of Variance Local Cycle only LDVs and LDTs All emit

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	6754.531 ^a	1	6754.531	48.616	.000
CO_OFF	6754.531	1	6754.531	48.616	.000
Error	10142.446	73	138.938		
Total	16896.976	74			

a. R Squared = .400 (Adjusted R Squared = .392)

Parameter Estimates

Dependent Variable: CO_DIFF

					95% Confide	ence Interval
Parameter	В	Std. Error	t	Sig.	Lower Bound	Upper Bound
CO_OFF	.125	.018	6.972	.000	8.948E-02	.161

SECTION K CO Univariate Analysis of Variance Local cycle only Normal emitters only

Between-Subjects Factors

		N
VEHCLASS	LDT1	16
	LDT2	6
	LDV	46

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	3803.884 ^a	5	760.777	8.018	.000
VEHCLASS	835.916	3	278.639	2.937	.040
AVG_SPD	3.965	1	3.965	.042	.839
CO_OFF	237.803	1	237.803	2.506	.118
Error	5977.832	63	94.886		
Total	9781.715	68			

a. R Squared = .389 (Adjusted R Squared = .340)

Estimated Marginal Means

VEHCLASS

Estimates

Dependent Variable: CO_DIFF

			95% Confidence Interva	
VEHCLASS	Mean	Std. Error	Lower Bound	Upper Bound
LDT1	1.267 ^a	2.557	-3.843	6.378
LDT2	13.300 ^a	3.986	5.334	21.265
LDV	7.685 ^a	1.455	4.777	10.594

a. Evaluated at covariates appeared in the model: AVG_SPD = 10.00000, CO_OFF = 6.00891.

Pairwise Comparisons

Dependent Variable: CO_DIFF

		Mean			95% Confide for Diffe	ence Interval erence ^a
(I) VEHCLASS	(J) VEHCLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT1	LDT2	-12.032*	4.781	.014	-21.586	-2.478
	LDV	-6.418*	3.005	.037	-12.422	414
LDT2	LDT1	12.032*	4.781	.014	2.478	21.586
	LDV	5.614	4.228	.189	-2.835	14.064
LDV	LDT1	6.418*	3.005	.037	.414	12.422
	LDT2	-5.614	4.228	.189	-14.064	2.835

Based on estimated marginal means

*. The mean difference is significant at the .05 level.

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: CO_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	703.835	2	351.918	3.709	.030
Error	5977.832	63	94.886		

The F tests the effect of VEHCLASS. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

SECTION L CO Univariate Analysis of Variance Local Cycle only LDT & LDV Normal Emitters Only

Between-Subjects Factors

		N
CLASS	LDT	22
	LDV	46

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	3202.891 ^a	3	1067.630	10.548	.000
CO_OFF	118.764	1	118.764	1.173	.283
CLASS	1084.797	2	542.398	5.359	.007
Error	6578.825	65	101.213		
Total	9781.715	68			

a. R Squared = .327 (Adjusted R Squared = .296)

Estimated Marginal Means

CLASS

Estimates

Dependent Variable: CO_DIFF

			95% Confidence Interval	
			Lower	Upper
CLASS	Mean	Std. Error	Bound	Bound
LDT	4.824 ^a	2.195	.440	9.208
LDV	7.553 ^a	1.500	4.558	10.549

a. Evaluated at covariates appeared in the model: CO_OFF = 6.00891.

Pairwise Comparisons

Dependent Variable: CO_DIFF

		Mean			95% Confide for Diffe	ence Interval erence ^a
(I) CLASS	(J) CLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT	ĹĎV	-2.729	2.698	.315	-8.116	2.659
LDV	LDT	2.729	2.698	.315	-2.659	8.116

Based on estimated marginal means

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: CO_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	103.579	1	103.579	1.023	.315
Error	6578.825	65	101.213		

The F tests the effect of CLASS. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

SECTION M CO Univariate Analysis of Variance Local Cycly Only Normal Emitters only LDV & LDT

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	2118.094 ^a	1	2118.094	18.518	.000
CO_OFF	2118.094	1	2118.094	18.518	.000
Error	7663.622	67	114.382		
Total	9781.715	68			

a. R Squared = .217 (Adjusted R Squared = .205)

Parameter Estimates

Dependent Variable: CO_DIFF

					95% Confide	ence Interval
Parameter	В	Std. Error	t	Sia.	Lower Bound	Upper Bound
CO_OFF	.678	.158	4.303	.000	.364	.993

SECTION N CO Univariate Analysis of Variance Local Cycle only High emitters only

Between-Subjects Factors

		N
VEHCLASS	LDT1	2
	LDT2	2
	LDV	2

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	7075.528 ^a	5	1415.106	35.615	.127
VEHCLASS	980.390	3	326.797	8.225	.250
AVG_SPD	945.375	1	945.375	23.793	.129
CO_OFF	54.499	1	54.499	1.372	.450
Error	39.733	1	39.733		
Total	7115.261	6			

a. R Squared = .994 (Adjusted R Squared = .966)

Estimated Marginal Means

VEHCLASS

Estimates

Dependent Variable: CO_DIFF

			95% Confidence Interval	
			Lower	Upper
VEHCLASS	Mean	Std. Error	Bound	Bound
LDT1	-3.500 ^a	9.341	-122.192	115.192
LDT2	8.052 ^a	8.188	-95.982	112.086
LDV	69.074 ^a	15.722	-130.699	268.846

a. Evaluated at covariates appeared in the model: AVG_SPD = 10.00000, CO_OFF = 197.68800.

Pairwise Comparisons

Dependent Variable: CO_DIFF

		Mean			95% Confide for Diffe	ence Interval erence ^a
(I) VEHCLASS	(J) VEHCLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT1	LDT2	-11.552	6.445	.324	-93.438	70.333
	LDV	-72.574	24.125	.204	-379.108	233.961
LDT2	LDT1	11.552	6.445	.324	-70.333	93.438
	LDV	-61.021	22.833	.228	-351.141	229.098
LDV	LDT1	72.574	24.125	.204	-233.961	379.108
	LDT2	61.021	22.833	.228	-229.098	351.141

Based on estimated marginal means

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: CO_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	388.354	2	194.177	4.887	.305
Error	39.733	1	39.733		

The F tests the effect of VEHCLASS. This test is based on the linearly

independent pairwise comparisons among the estimated marginal means.

SECTION O CO Univariate Analysis of Variance High Emitters Only Local Cycle Only LDV & LDT

Between-Subjects Factors

		N
CLASS	LDT	4
	LDV	2

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	6947.853 ^a	4	1736.963	20.751	.047
AVG_SPD	870.834	1	870.834	10.404	.084
CO_OFF	26.455	1	26.455	.316	.631
CLASS	852.715	2	426.357	5.094	.164
Error	167.408	2	83.704		
Total	7115.261	6			

a. R Squared = .976 (Adjusted R Squared = .929)

Estimated Marginal Means

CLASS

Dependent Variable: CO_DIFF

			95% Confidence Interval		
			Lower	Upper	
CLASS	Mean	Std. Error	Bound	Bound	
LDT	5.089 ^a	11.639	-44.990	55.167	
LDV	63.449 ^a	22.361	-32.763	159.660	

a. Evaluated at covariates appeared in the model: AVG_SPD = 10.00000, CO_OFF = 197.68800.

Pairwise Comparisons

Dependent Variable: CO_DIFF

		Mean			95% Confidence Interval for Difference ^a	
(I) CLASS	(J) CLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT	LDV	-58.360	33.070	.220	-200.650	83.929
LDV	LDT	58.360	33.070	.220	-83.929	200.650

Based on estimated marginal means

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: CO_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	260.679	1	260.679	3.114	.220
Error	167.408	2	83.704		

The F tests the effect of CLASS. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

Univariate Analysis of Variance

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	6095.138 ^a	2	3047.569	11.950	.021
AVG_SPD	35.792	1	35.792	.140	.727
CO_OFF	3759.501	1	3759.501	14.741	.018
Error	1020.123	4	255.031		
Total	7115.261	6			

a. R Squared = .857 (Adjusted R Squared = .785)

SECTION P

CO Univariate Analysis of Variance Local Cycle Only High Emitters Only LDV & LDT

Tests of Between-Subjects Effects

Dependent Variable: CO_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	6059.346 ^a	1	6059.346	28.692	.003
CO_OFF	6059.346	1	6059.346	28.692	.003
Error	1055.915	5	211.183		
Total	7115.261	6			

a. R Squared = .852 (Adjusted R Squared = .822)

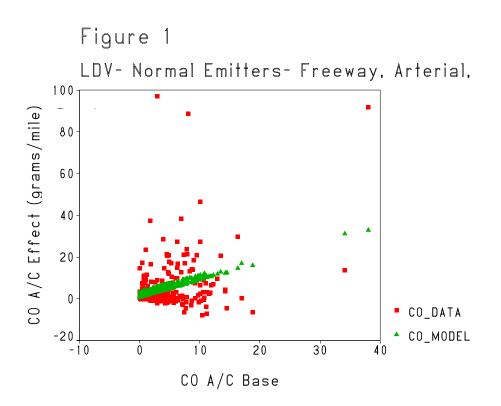
Parameter Estimates

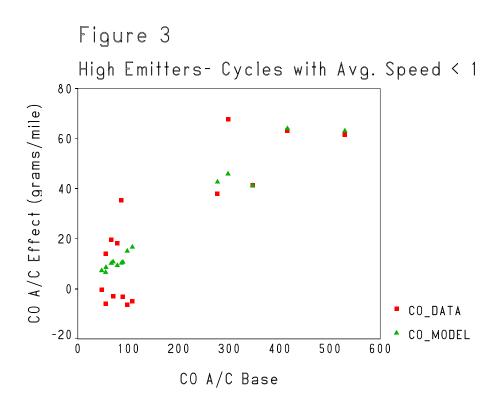
Dependent Variable: CO_DIFF

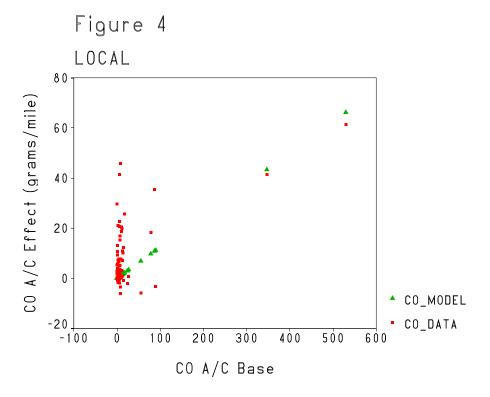
			95% Confidence Interval	
Std Error	t	Sia	Lower Bound	Upper Bound
.022	5.357	.003	6.206E-02	177
	Std. Error			Std. Error t Sig. Bound

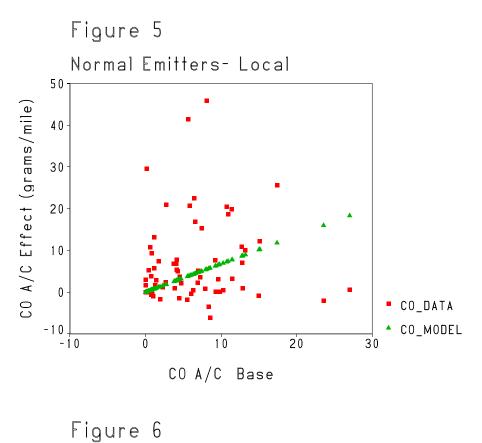
Appendix E: CO Graphs

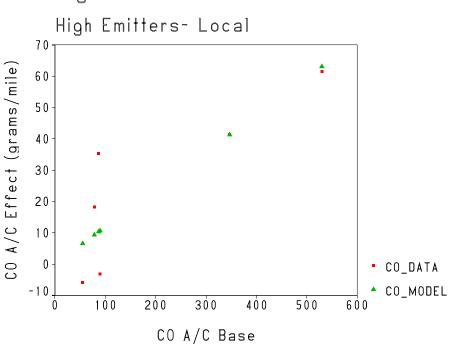
CO Graphs











Appendix F: NOx ANOVA Results

SECTION A NOx Univariate Analysis of Variance All Vehicle Classes All Cycles

Between-Subjects Factors

		N
VEHCLASS	LDT1	126
	LDT2	56
	LDV	335
FACILITY	1	111
	2	221
	3	74
	4	74
	5	37

Tests of Between-Subjects Effects

Dependent Variable: NOX_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Corrected Model	25.912 ^a	16	1.620	11.798	.000
Intercept	2.523	1	2.523	18.376	.000
NOX_OFF	15.856	1	15.856	115.504	.000
AVG_SPD	2.876	1	2.876	20.950	.000
VEHCLASS	3.057	2	1.529	11.136	.000
FACILITY	2.076	4	.519	3.780	.005
VEHCLASS * FACILITY	.741	8	9.264E-02	.675	.714
Error	68.638	500	.137		
Total	144.847	517			
Corrected Total	94.550	516			

a. R Squared = .274 (Adjusted R Squared = .251)

Estimated Marginal Means

1. VEHCLASS

Estimates

Dependent Variable: NOX_DIFF

			95% Confidence Interval		
VEHCLASS	Mean	Std. Error	Lower Bound	Upper Bound	
LDT1	.169 ^a	.040	9.094E-02	.248	
LDT2	.159 ^a	.059	4.233E-02	.276	
LDV	.362 ^a	.024	.314	.409	

a. Evaluated at covariates appeared in the model: NOX_OFF = .76540, AVG_SPD = 27.95300.

Pairwise Comparisons

Dependent Variable: NOX_DIFF

		Mean			95% Confidence Interval for Difference ^a	
(I) VEHCLASS	(J) VEHCLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT1	LDT2	1.022E-02	.070	.885	128	.149
	LDV	192*	.047	.000	284	101
LDT2	LDT1	-1.022E-02	.070	.885	149	.128
	LDV	203*	.064	.002	329	-7.640E-02
LDV	LDT1	.192*	.047	.000	.101	.284
	LDT2	.203*	.064	.002	7.640E-02	.329

Based on estimated marginal means

*. The mean difference is significant at the .05 level.

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: NOX_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	3.057	2	1.529	11.136	.000
Error	68.638	500	.137		

The F tests the effect of VEHCLASS. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

2. FACILITY

Estimates

Dependent Variable: NOX_DIFF

			95% Confidence Interval		
FACILITY	Mean	Std. Error	Lower Bound	Upper Bound	
1	.277 ^a	.047	.185	.369	
2	.274 ^a	.035	.205	.343	
3	.386 ^a	.060	.269	.504	
4	.167 ^a	.056	5.719E-02	.278	
5	4.579E-02 ^a	.080	111	.202	

a. Evaluated at covariates appeared in the model: NOX_OFF = .76540, AVG_SPD = 27.95300.

Pairwise Comparisons

Dependent Variable: NOX_DIFF

		Mean			95% Confide for Diffe	ence Interval erence ^a
		Difference			Lower	Upper
(I) FACILITY	(J) FACILITY	(I-J)	Std. Error	Sig. ^a	Bound	Bound
1	2	3.012E-03	.061	.961	117	.123
	3	109	.072	.131	251	3.267E-02
	4	.109	.072	.128	-3.150E-02	.250
	5	.231*	.093	.013	4.826E-02	.414
2	1	-3.012E-03	.061	.961	123	.117
	3	112	.074	.128	257	3.244E-02
	4	.106	.068	.117	-2.668E-02	.239
	5	.228*	.086	.008	5.954E-02	.396
3	1	.109	.072	.131	-3.267E-02	.251
	2	.112	.074	.128	-3.244E-02	.257
	4	.219*	.080	.006	6.207E-02	.375
	5	.340*	.101	.001	.142	.538
4	1	109	.072	.128	250	3.150E-02
	2	106	.068	.117	239	2.668E-02
	3	219*	.080	.006	375	-6.207E-02
	5	.122	.097	.213	-6.998E-02	.313
5	1	231*	.093	.013	414	-4.826E-02
	2	228*	.086	.008	396	-5.954E-02
	3	340*	.101	.001	538	142
	4	122	.097	.213	313	6.998E-02

Based on estimated marginal means

*. The mean difference is significant at the .05 level.

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: NOX_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	2.076	4	.519	3.780	.005
Error	68.638	500	.137		

The F tests the effect of FACILITY. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

SECTION B NOx Univariate Analysis of Variance Log Space No Ramp Cycle LDV only

Tests of Between-Subjects Effects

Dependent Variable: NOX_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	57.523 ^a	2	28.761	182.563	.000
LG10NOX1	26.665	1	26.665	169.256	.000
LG10SPD	4.680E-02	1	4.680E-02	.297	.586
Error	48.681	309	.158		
Total	106.203	311			

a. R Squared = .542 (Adjusted R Squared = .539)

Parameter Estimates

Dependent Variable: NOX_DIFF

					95% Confidence Interval	
					Lower	Upper
Parameter	В	Std. Error	t	Sig.	Bound	Bound
LG10NOX1	1.865	.143	13.010	.000	1.583	2.148
LG10SPD	-1.350E-02	.025	545	.586	-6.225E-02	3.525E-02

SECTION C NOx Univariate Analysis of Variance Linear Space LDV only No Ramp Cycle

Tests of Between-Subjects Effects

Dependent Variable: NOX_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	54.725 ^a	2	27.363	164.245	.000
AVG_SPD	8.316E-02	1	8.316E-02	.499	.480
NOX_OFF	39.687	1	39.687	238.225	.000
Error	51.478	309	.167		
Total	106.203	311			

a. R Squared = .515 (Adjusted R Squared = .512)

Parameter Estimates

Dependent Variable: NOX_DIFF

					95% Confidence Interval	
					Lower	Upper
Parameter	В	Std. Error	t	Sig.	Bound	Bound
AVG_SPD	-5.996E-04	.001	707	.480	-2.270E-03	1.070E-03
NOX_OFF	.459	.030	15.435	.000	.400	.517

SECTION D

Speed Bin Approach Speed < 15

Tests of Between-Subjects Effects

Dependent Variable: NOX_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	39.366 ^a	1	39.366	244.308	.000
LG10NOX1	39.366	1	39.366	244.308	.000
Error	15.308	95	.161		
Total	54.674	96			

a. R Squared = .720 (Adjusted R Squared = .717)

Parameter Estimates

Dependent Variable: NOX_DIFF

					95% Confide	ence Interval
Parameter	В	Std. Error	t	Sig.	Lower Bound	Upper Bound
LG10NOX1	2.637	.169	15.630	.000	2.302	2.971

15 < Speed < 30

Tests of Between-Subjects Effects

Dependent Variable: NOX_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	22.324 ^a	1	22.324	157.233	.000
LG10NOX1	22.324	1	22.324	157.233	.000
Error	20.303	143	.142		
Total	42.626	144			

a. R Squared = .524 (Adjusted R Squared = .520)

Parameter Estimates

Dependent Variable: NOX_DIFF

					95% Confide	ence Interval
Parameter	В	Std. Error	t	Sig.	Lower Bound	Upper Bound
LG10NOX1	1.668	.133	12.539	.000	1.405	1.931

Speed > 30

Tests of Between-Subjects Effects

Dependent Variable: NOX_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	4.673 ^a	1	4.673	61.140	.000
LG10NOX1	4.673	1	4.673	61.140	.000
Error	7.184	94	7.642E-02		
Total	11.856	95			

a. R Squared = .394 (Adjusted R Squared = .388)

Parameter Estimates

Dependent Variable: NOX_DIFF

					95% Confide	ence Interval
Parameter	В	Std. Error	t	Sia.	Lower Bound	Upper Bound
LG10NOX1	.900	.115	7.819	.000	.672	1.129

SECTION E LDV NOx Model No Ramp Cycle

Tests of Between-Subjects Effects

Dependent Variable: NOX_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	65.252 ^a	2	32.626	246.184	.000
LG10NOX1	18.783	1	18.783	141.730	.000
LGNXLGS	7.776	1	7.776	58.678	.000
Error	40.951	309	.133		
Total	106.203	311			

a. R Squared = .614 (Adjusted R Squared = .612)

Parameter Estimates

Dependent Variable: NOX_DIFF

					95% Confide	ence Interval
Parameter	В	Std. Error	t	Sig.	Lower Bound	Upper Bound
LG10NOX1	4.867	.409	11.905	.000	4.063	5.672
LGNXLGS	-2.296	.300	-7.660	.000	-2.886	-1.706

SECTION F LOG Space LDT only No Ramp Cycle

Tests of Between-Subjects Effects

Dependent Variable: NOX_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	12.006 ^a	2	6.003	45.623	.000
LG10NOX1	2.289	1	2.289	17.398	.000
LG10SPD	1.182E-02	1	1.182E-02	.090	.765
Error	23.684	180	.132		
Total	35.690	182			

a. R Squared = .336 (Adjusted R Squared = .329)

Parameter Estimates

Dependent Variable: NOX_DIFF

					95% Confide	ence Interval
					Lower	Upper
Parameter	В	Std. Error	t	Sig.	Bound	Bound
LG10NOX1	.786	.188	4.171	.000	.414	1.158
LG10SPD	1.247E-02	.042	.300	.765	-6.963E-02	9.458E-02

Linear Space LDT Only No Ramp Cycle

Tests of Between-Subjects Effects

Dependent Variable: NOX_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	10.730 ^a	2	5.365	38.690	.000
NOX_OFF	5.232	1	5.232	37.729	.000
AVG_SPD	9.585E-05	1	9.585E-05	.001	.979
Error	24.960	180	.139		
Total	35.690	182			

a. R Squared = .301 (Adjusted R Squared = .293)

Parameter Estimates

Dependent Variable: NOX_DIFF

					95% Confide	ence Interval
					Lower	Upper
Parameter	В	Std. Error	t	Sig.	Bound	Bound
NOX_OFF	.204	.033	6.142	.000	.138	.269
AVG_SPD	3.132E-05	.001	.026	.979	-2.320E-03	2.382E-03

SECTION G Speed Bin Approach

Speed < 15

Tests of Between-Subjects Effects

Dependent Variable: NOX_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	6.604 ^a	1	6.604	32.468	.000
LG10NOX1	6.604	1	6.604	32.468	.000
Error	10.373	51	.203		
Total	16.977	52			

a. R Squared = .389 (Adjusted R Squared = .377)

Parameter Estimates

Dependent Variable: NOX_DIFF

					95% Confide	ence Interval
Parameter	В	Std. Error	f t	Sig.	Lower Bound	Upper Bound
LG10NOX1	1.201	.211	5.698	.000	.778	1.624

15 < Speed < 31

Tests of Between-Subjects Effects

Dependent Variable: NOX_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	4.634 ^a	1	4.634	52.617	.000
LG10NOX1	4.634	1	4.634	52.617	.000
Error	6.782	77	8.808E-02		
Total	11.416	78			

a. R Squared = .406 (Adjusted R Squared = .398)

Parameter Estimates

Dependent Variable: NOX_DIFF

					95% Confide	ence Interval
Parameter	в	Std. Error	t t	Sig.	Lower Bound	Upper Bound
LG10NOX1	.820	.113	7.254	.000	.595	1.046
LOTONOAT	.020	.115	7.234	.000	.090	1.040

Speed > 31

Tests of Between-Subjects Effects

Dependent Variable: NOX_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	1.798 ^a	1	1.798	16.676	.000
LG10NOX1	1.798	1	1.798	16.676	.000
Error	5.499	51	.108		
Total	7.297	52			

a. R Squared = .246 (Adjusted R Squared = .232)

Parameter Estimates

Dependent Variable: NOX_DIFF

					95% Confide	ence Interval
Parameter	В	Std. Error	t	Sig.	Lower Bound	Upper Bound
LG10NOX1	.561	.137	4.084	.000	.285	.837

SECTION H LDT only No Ramp Cycle

Tests of Between-Subjects Effects

Dependent Variable: NOX_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	12.765 ^a	2	6.382	50.850	.000
LG10NOX1	2.436	1	2.436	19.406	.000
LGNXLGS	.735	1	.735	5.859	.017
Error	20.961	167	.126		
Total	33.726	169			

a. R Squared = .378 (Adjusted R Squared = .371)

Parameter Estimates

Dependent Variable: NOX_DIFF

					95% Confide	ence Interval
					Lower	Upper
Parameter	В	Std. Error	t	Sig.	Bound	Bound
LG10NOX1	1.930	.438	4.405	.000	1.065	2.795
LGNXLGS	769	.318	-2.421	.017	-1.395	142

SECTION I NOx Univariate Analysis of Variance Log fit

Ramp Cycle only

Between-Subjects Factors

		N
VEHCLASS	LDT1	9
	LDT2	4
	LDV	24

Tests of Between-Subjects Effects

Dependent Variable: NOX_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	2.147 ^a	4	.537	6.391	.001
VEHCLASS	.466	3	.155	1.850	.157
LGNOX	.663	1	.663	7.897	.008
Error	2.771	33	8.397E-02		
Total	4.918	37			

a. R Squared = .437 (Adjusted R Squared = .368)

Estimated Marginal Means

VEHCLASS

Estimates

Dependent Variable: NOX_DIFF

			95% Confidence Interval		
			Lower	Upper	
VEHCLASS	Mean	Std. Error	Bound	Bound	
LDT1	8.673E-02 ^a	.101	118	.291	
LDT2	-6.543E-02 ^a	.148	366	.236	
LDV	.270 ^a	.061	.146	.395	

a. Evaluated at covariates appeared in the model: LGNOX = .2645.

Pairwise Comparisons

Dependent Variable: NOX_DIFF

		Mean			95% Confide for Diffe	ence Interval erence ^a
(I) VEHCLASS	(J) VEHCLASS	Difference (I-J)	Std. Error	Sig. ^a	Lower Bound	Upper Bound
LDT1	LDT2	.152	.174	.389	202	.506
	LDV	184	.121	.139	430	6.299E-02
LDT2	LDT1	152	.174	.389	506	.202
	LDV	336*	.163	.047	667	-4.339E-03
LDV	LDT1	.184	.121	.139	-6.299E-02	.430
	LDT2	.336*	.163	.047	4.339E-03	.667

Based on estimated marginal means

*. The mean difference is significant at the .05 level.

a. Adjustment for multiple comparisons: Least Significant Difference (equivalent to no adjustments).

Univariate Tests

Dependent Variable: NOX_DIFF

	Sum of Squares	df	Mean Square	F	Sig.
Contrast	.438	2	.219	2.608	.089
Error	2.771	33	8.397E-02		

The F tests the effect of VEHCLASS. This test is based on the linearly independent pairwise comparisons among the estimated marginal means.

SECTION J NOx Univariate Analysis of Variance Log format All veh. class Ramp Cycle only

Tests of Between-Subjects Effects

Dependent Variable: NOX_DIFF

Source	Type III Sum of Squares	df	Mean Square	F	Sig.
Model	1.681 ^a	1	1.681	18.690	.000
LGNOX	1.681	1	1.681	18.690	.000
Error	3.237	36	8.992E-02		
Total	4.918	37			

a. R Squared = .342 (Adjusted R Squared = .323)

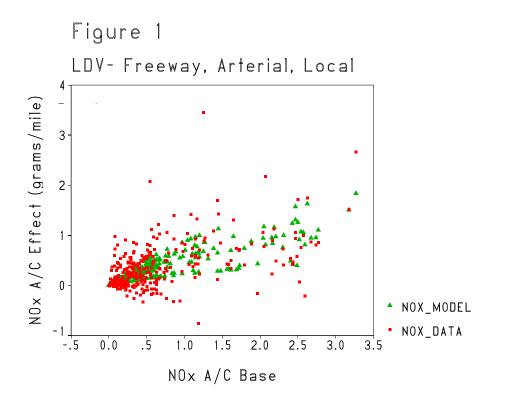
Parameter Estimates

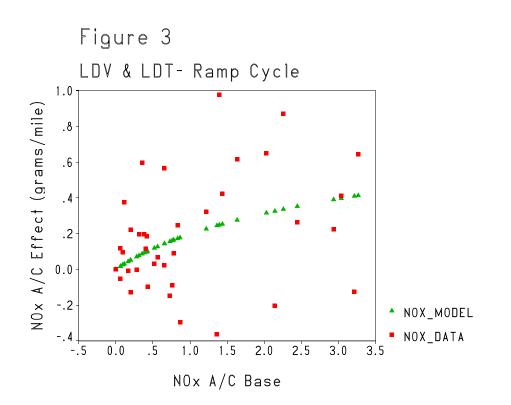
Dependent Variable: NOX_DIFF

					95% Confidence Interval	
	_	o		e.	Lower	Upper
Parameter	В	Std. Error	t	Sig.	Bound	Bound
LGNOX	.655	.152	4.323	.000	.348	.963

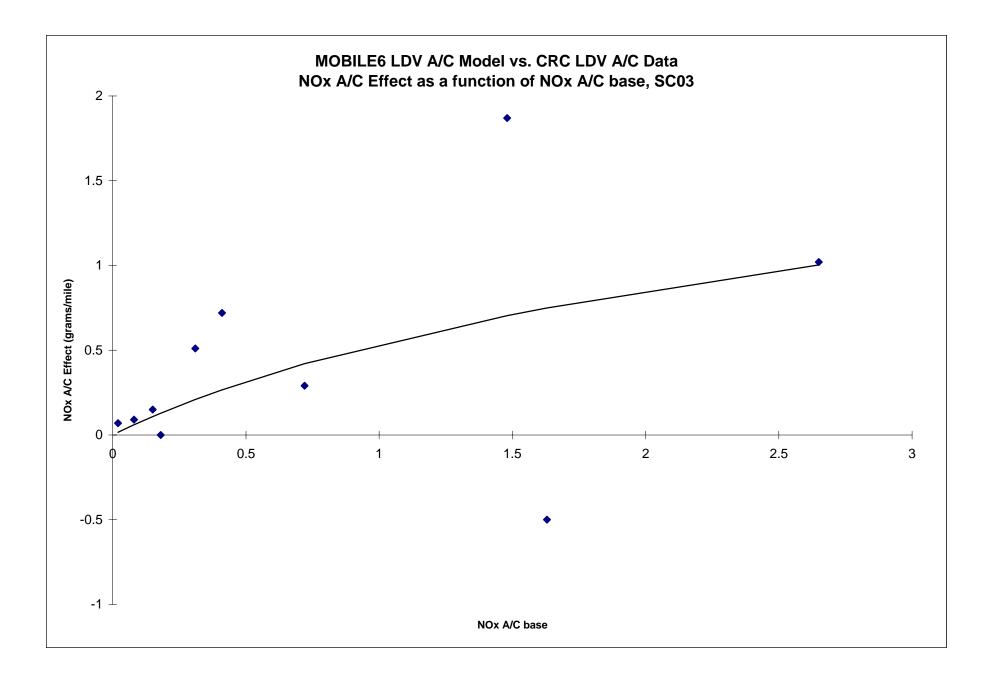
Appendix G: NOx Graphs

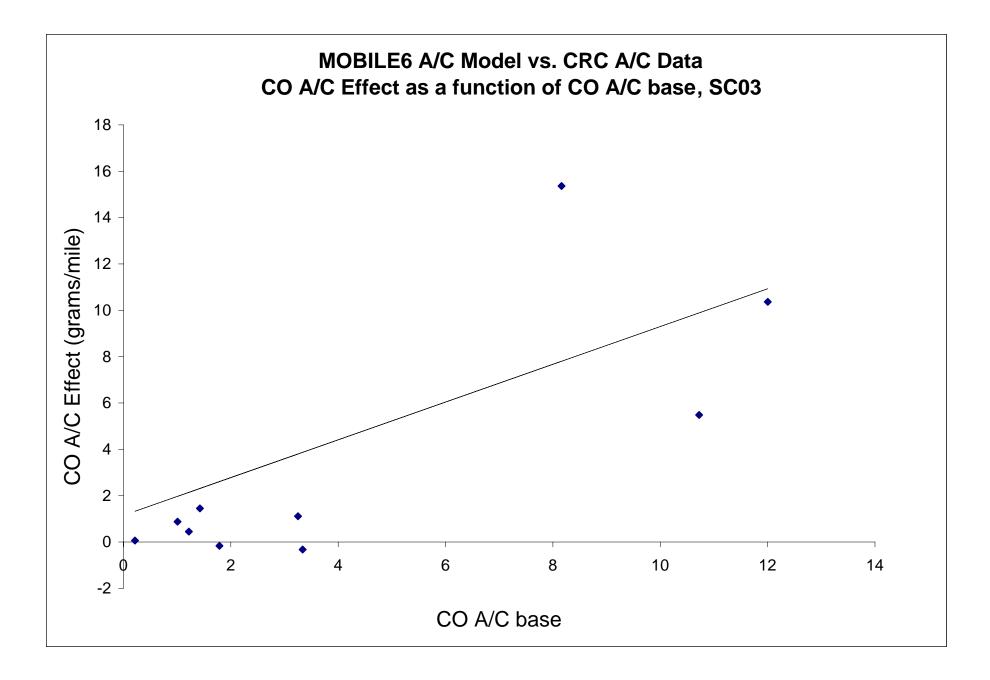
NOx Graphs

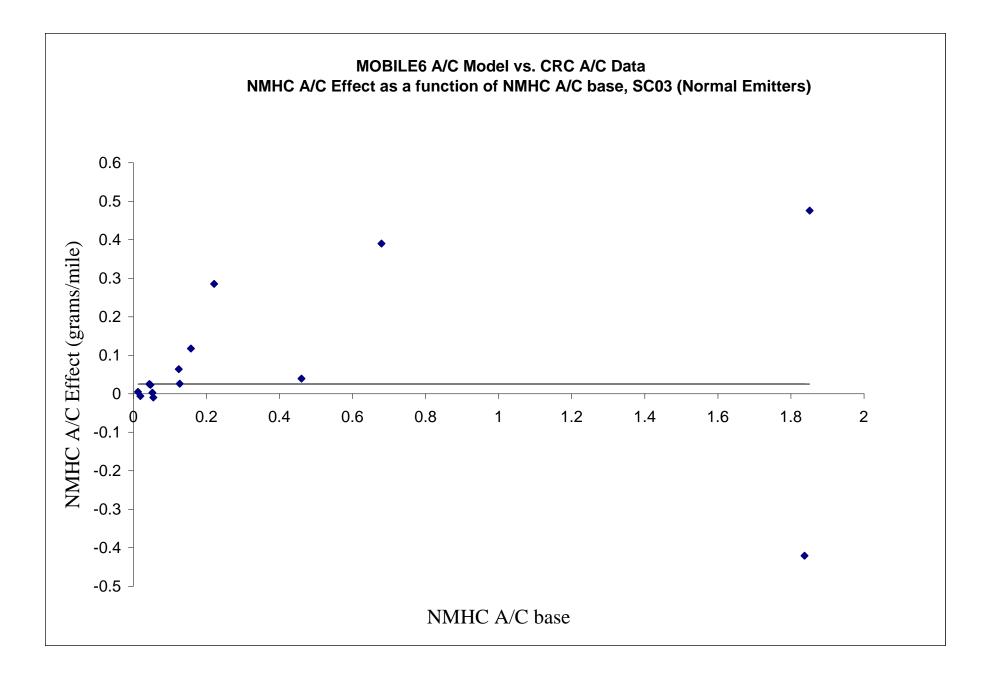




Appendix H: CRC Comparison Graphs







Appendix I: Cold Start Ratios

	LI	DV	LDT			
	Normal	High	Normal	High		
Fuel	1.17	n/a	1.13	n/a		
NOx	1.24	n/a	1.19	n/a		
NMHC	0.96	1.29	1.05	0.97		
СО	0.95	1.60	1.17	0.99		

Table 1 - Cold Start ST01 A/C Ratios(average cycle speed = 20.2 mph)

Appendix J: SFTP Benefits

TABLE 1 TIER 1 SFTP BENEFITS FROM OFF-CYCLE OPERATION and AIR CONDITIONING*					
POLLUTANT SFTP BENEFIT					
НС 100%					
CO Fuel Consumption Increase					
NOx 50%					
*EPA rule estimated benefits of Tier 1 SFTP standards, in terms of percent reduction of uncontrolled "excess" emissions.					

TABLE 2 WORKSHEET FOR DEVELOPING LEV NOX BENEFITS								
	Tier 1 (50K Miles)			LEV (4K Miles)				
	LDV/ T1 LDT2 LDT3 LDT4 LDV/ T1 LDT2 LDT3				LDT4			
(1) Average FTP Certification Level	0.17	0.19	0.24	0.30	0.07	0.11	0.13	0.16
(2) Estimated "Running" Certification Level	0.15	0.17	0.21	0.27	0.06	0.10	0.11	0.14
(3) Estimated NOx 4K Standard (ARB)					0.17	0.23	0.27	0.38
(4) Estimated NOx 50K Standard (EPA)	0.58	0.90	0.90	1.32				
(5) US06 Standard / Running Certification Level					2.67	2.32	2.35	2.70
(6) Additional Stringency of ARB Standard					40%	69%	59%	56%
(7) EPA SFTP Benefit (%)	50	50	50	50				
(8) ARB Benefit (%)					70%	85%	79%	78%

TABLE 3 LEV SFTP BENEFITS FROM A/C OPERATION							
	LDV/LDT1	LD2	LD3	LD4			
HC	100%	100%	100%	100%			
СО	20% Remain	20% Remain	20% Remain	20% Remain			
NOx	70%	85%	79%	78%			
*EPA rule estimated benefits of LEV SFTP standards, in terms of percent reduction of uncontrolled "excess" emissions.							

Appendix K: Peer Review Comments This section summarizes comments from the two formal peer reviews the original draft report underwent after publication in March 1998.

Commentor 1:

The comment text is verbatim from the commentor, minus editorial corrections to maintain the confidentiality of the commentor. Because the report was significantly modified after these comments were received, many of the detailed comments are no longer applicable. The overarching recommendations in the "general comment" section were addressed through the change in approach from a multiplicative air conditioning correction factor to an additive correction factor.

General comment:

You are using the ratios (with a/c)/(without a/c). Perhaps early in the paper it would be helpful to indicate reason for using pollutant ratios instead of increments (so it will apply to large cars as well as small; high emitters as well as low?). Such ratios for pollutants seem more logical than for engine power. The power increment needed by the a/c compressor is more easily modeled as an absolute number than a ratio. This observation is the basis for many comments that follow. Basically, a/c power requirement is almost linearly proportional to engine rpm at a given compressor suction and discharge pressure. These pressures depend, in turn, on the indoor and outdoor temperature and airflow condition, which apparently are identical for the vehicle testing program discussed in the draft report. Therefore improvements might be obtained by adding the a/c power directly to the (large or small) engine power first, and then perhaps employ the assumption that emissions are directly proportional to the total engine power (for drivetrain plus compressor).

Page 2

"It should be noted that the correction factors presented in this report apply to vehicles which do not comply with the SFTP requirement." We would add some comment or hint indicating why it does not apply. What would be needed to comply? What are the effects on non-compliance? Answers are well-known to those familiar with the issues, but probably not to many readers.

Page 3, para 1

Define "standard cooling"; it is not clear whether it refers to an engine cooling or a/c setting. Explain rationale for the "driver window down" criterion: to ensure that the interior of the car does not cool, so the indoor coil sees high temperature air. The justification for the "max a/c, recirc" setting is not clear. By recirculating air that has already been dehumidified instead of using 100% fresh air, the open window and the recirculation are working at cross purposes. Small differences in wind outside the driver's window will therefore affect the amount of mixing (of recirculated and fresh air) and therefore cause the evaporator to see different inlet conditions in different tests. This might explain some of the differences observed for the same vehicle at different test sites.

Page 3, para 3

Apparently the numerator of the correction factor is *measured* on the 95° test, while the denominator is a *calculated* (corrected) 75° test value. Next time such tests are done, a more accurate correction factor might be obtained by testing a/c off at 95° so both figures are measured in the same facility at the same time.

<u>pp 2-3</u>

The relative humidity in the 75° test is about 38%, and it is about 20% in the 95° test. The dew point of the air in the 95° test is 48°F, so the evaporator is probably removing sensible heat only. The coil will be wet and dehumidify the air only if the fan speed is low enough that the temperature of the exiting air drops below 48°. The report provides no information on exit air temperatures, so it is not possible to know whether closeness to the dewpoint might explain some of the variance between results obtained at different laboratories. At any rate, dry-coil conditions are not very common in actual operation. Under "full load" conditions (95°, relative humidity = 40%) the dewpoint is 67° so the coil will become wet and latent loads will appear when the air is cooled below that temperature.

Page 5, para 1

Notes the difference between high and low emitters for HC and CO. This raises the possibility, on cycles where compressor cycles on/off every few seconds, that different cars' air-fuel mixture controls might not be well-programmed to account for time constants as short as these. In other words, by the time the mixture adjusts to the step function input due to compressor power, the compressor cycles off.

Page 5 para 4 Typo on line 3: "is"

Page 5, para 4

It is surprising that the compressor was on for 97% of the time "on each of the cycles". Clarify here that only 4 of the cycles were tested, or the whole list shown in Table 2? Was compressor on full-time during the other cycles as well? On most cars the compressor shuts off when the suction pressure falls to the level where the refrigerant evaporating temperature reaches 32° (about 42 psia, or 28 psig). Since Table 4 says simply "psi", we suspect that it is a gage pressure and that explains why the compressor never shut off. The description of Table 4 is hard to understand without more knowledge of the differences between the test cells. For example if GM reported gage pressures and EPA reported absolute evaporating pressures, that could account for the differences noted.

Page 6, para 1

Implies that the GM test cell used a variable speed fan. Such differences between test cells should be explained more fully. For example would the fan affect the functioning of the open driver's window as well as the condenser face velocity? Are there any other differences, e.g. humidity? WEagree that more research might be required to fully explain differences, but my point is that a better partial explanation might be drawn from available data if the differences in test conditions were better documented. Similar comments arose when looking at Table 3; here are some comments prompted by it:

Table 3.

Discrepancies in this table should be better addressed; more explanations should be attempted. There could be four possible causes:

a)instruments used in each test laboratory are not equal or calibrated

b)the test conditions are not identical

c)the test procedure (measurement) is not identical

d)the vehicle was not identically adjusted prior to each test

The report does not describe what attempts, if any, were made to identify the reasons for nonrepeatability of measurements. In that respect, it would be good to document:

- a)types of instruments, year of production, date calibrated and where, accuracy, repeatability, range, etc. In what part of the instruments range were measurements?
- b)test conditions (for vehicle and a/c system) are not exactly described. What are possible differences? What are tolerances?
- c)Did operators have the same instructions? What are tolerances? Did technician repeat the test at one location at the same vehicle to demonstrate repeatability?
- d)What were the time periods (and maybe miles) between two tests? Was vehicle hauled or driven from one location to another?

Figures 5 to 10 and associated discussion

"Average Cycle Speed" is a term of art they will confuse mobile a/c experts who use the term "cycling" to describe the on/off operation of the compressor, and speak of the speed or frequency at which this occurs. It may be useful in this report to use the term "Vehicle speed" since the cycle is identified in the same Figure.

We would question the selection of the parabolic form of the regression line. We would expect that the influence of a/c system will decline as vehicle speed increases because engine power increases nonlinearly with vehicle speed (with the cube of engine rpm in a given gear?) while compressor power increases only linearly (or slightly less due to effect of ram air reducing condensing pressure), so the relative influence of compressor power is therefore reduced. In other words we would expect an asymptotic regression curve with ratio just above one at higher speeds. Such behavior seems consistent with the data shown on Figures 5, 6, 8, and 10.

Figures 7 and 9 show little or no influence of vehicle speed, or high scatter around whatever trend exists. This is not unexpected, because "vehicle speed" is a highly aggregated parameter. Perhaps we should not even be concerned about explaining whether speed or something else is the determining variable; this would be the case if we were interested only in emissions per cycle. If in the future it is necessary to try to eliminate some of this scatter in order to better understand the factors affecting emission variations among cycles, one could break the cycles into "speed bins" and calculate a mileage-weighted average of emissions. This might provide a more solid foundation when one wants to tie backwards to the emission standards which are expressed in grams/mile on a given cycle, or forwards to application of these correction factors to facility types having different average speeds. However even such a technique would fail to capture effects of acceleration differences between cycles. Therefore it might be wise to examine ways to model emissions based on cycle testing alone, rather than using vehicle speed as an intermediate variable. However if the correlation approach is needed and must be improved, it

might be worth trying adding two additional variables from the cycles: average acceleration and percent idle time.

Page 7 para 3 Typo on line 2: "vehicles were"

<u>Page 8, para 3</u> We would not make too much of the dip at middle speeds; we would view it as scatter until considering how speeds and accelerations are distributed within cycles.

Commentor 2:

Charles Kowalski, PhD Center for Statistical Consultation and Research University of Michigan

Verbatim comments not available electronically. Hard copies available upon request. As with the first set of comments, because the report was significantly modified after these comments were received, many of the detailed comments are no longer applicable.

Comment: The general recommendation was to be more systematic in how to determine what effects are important for generating correction factors, while at the same time acknowledging that factors such as technical judgement may play as important a role as statistical significance; in general, statistical significance should not be the sole judge of determining correction factors.

Response: the current approach represents a good balance between technical judgement in the absence of data, but statistical approach for determining correction factors where merited by data