







EPA's Locomotive Emissions Rule (and a bit about fuel)

Abby Swaine U.S. EPA New England Diesel Initiative, SmartWay Transport & Freight Efficiency New England Railroad Club March 25, 2014



- *"Control of Emissions of Air Pollution from Locomotive Engines and Marine Compression-Ignition Engines Less Than 30 Liters per Cylinder"*
- *"Control the Emissions of Air Pollution from Nonroad Diesel Engines and Fuel"*
 - What do the rules require and why?
 - To whom and to what equipment do they apply?
 - How is EPA insuring compliance?



- Context
- Locomotive rule requirements: Overview
- Locomotive standards and certification: Detail
- Illustrations
- Fuel requirements
- Locomotive rule: Compliance & Enforcement
- Q&A, Discussion





CONTEXT

Freight Sector Greenhouse Gas Emissions

Transportation in U.S.:

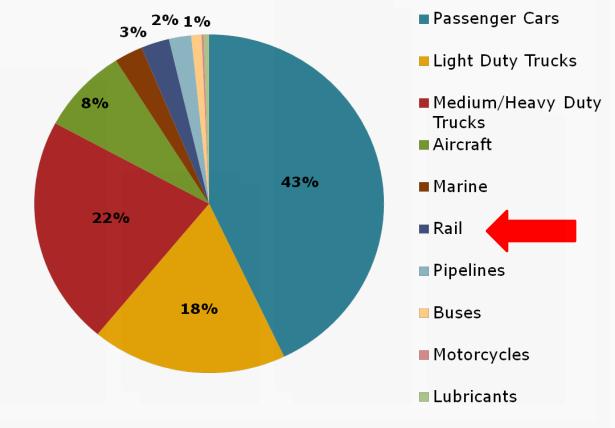
• Over 1/4 of total GHG emissions;

• About 2/3 of petroleumbased fuel use.

Within Transport Sector:

• Freight accounts for over 25% of all fuel consumed and GHGs emitted.

• Freight is fastest growing source of transport GHGs.



Transportation Greenhouse Gases

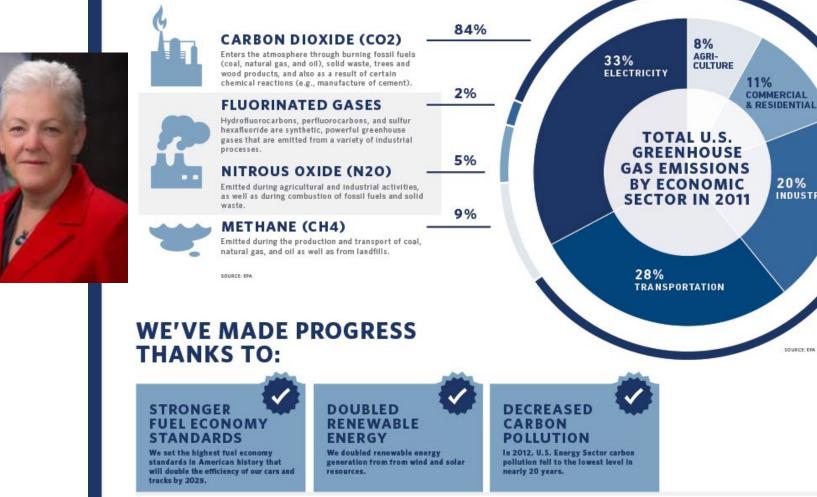
2011 Data - Inventory of U.S. Greenhouse Gas Emissions and Sinks (EPA 2013)

WE'RE STILL CONTRIBUTING TO THE PROBLEM CARBON POLLUTION IS THE BIGGEST DRIVER OF CLIMATE CHANGE **U.S. GREENHOUSE GAS POLLUTION INCLUDES:**

20%

INDUSTRY

SOURCE: ERA



BUT WE HAVE MORE WORK TO DO.

National Clean Diesel Campaign Office of Transportation & Air Quality

Tier 2 Light-Duty final rule 1999 fully phased in 2009* Diesels held to same standards as gasoline vehicles



Heavy-Duty Highway

sales 800,000 / yr final rule 2000 fully phased in 2010*

Locomotive/Marine

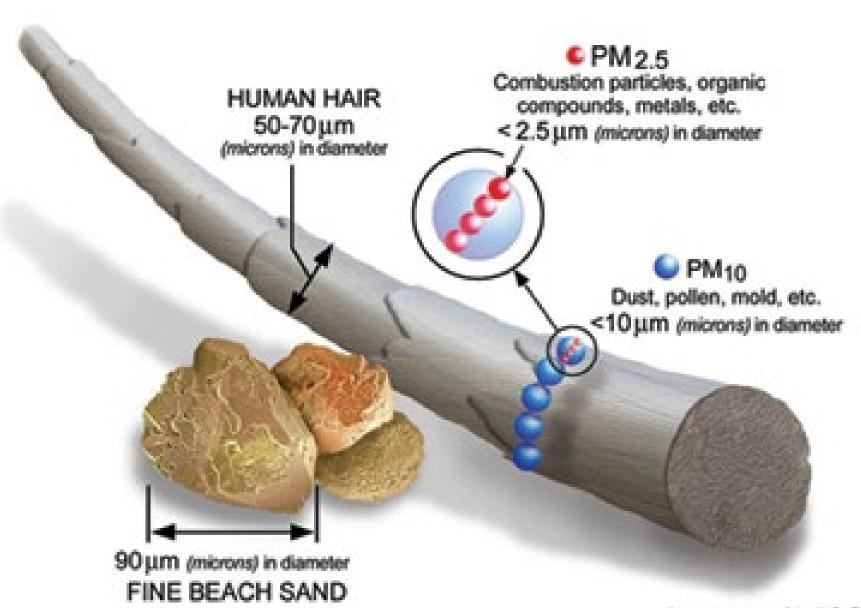
sales 40,000 marine engines & 1,000 locomotives / yr final rule 2008 fully phased in 2017 New in 2012: Coastal Emission Control Areas



Nonroad Diesel

sales over 650,000 / yr final rule 2004 fully phased in 2015

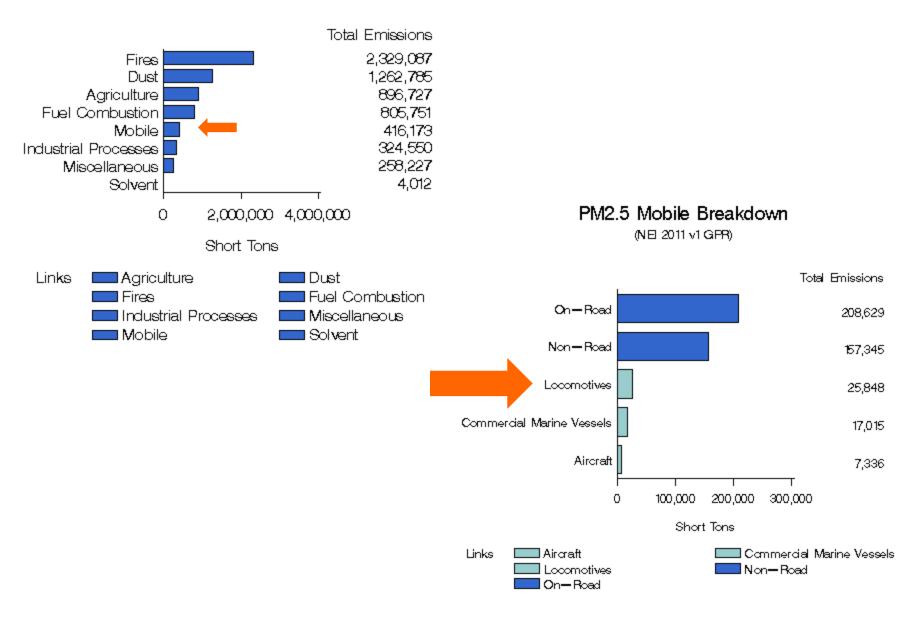
*Not counting new GHG & FE standards.



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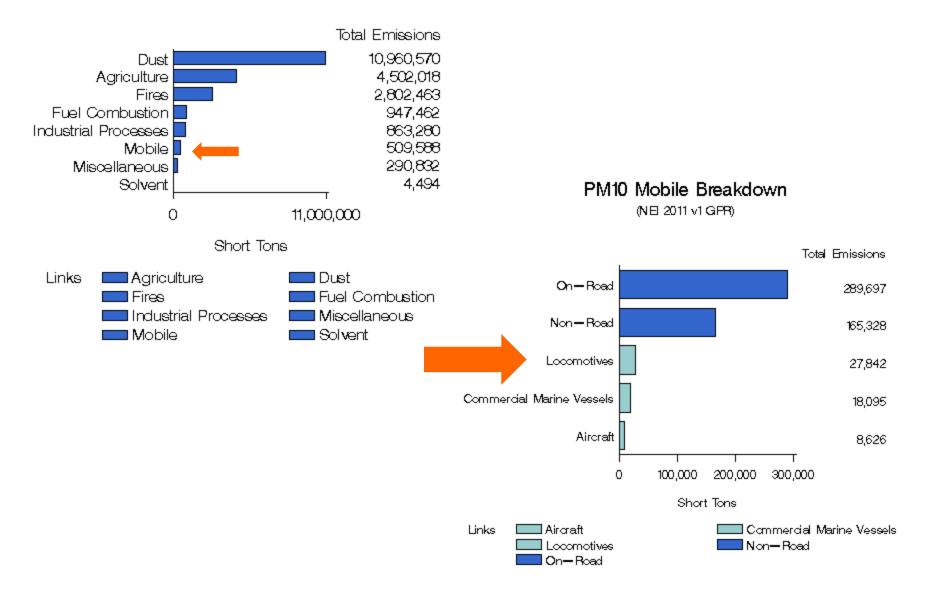
National PM2.5 Emissions by Source Sector

(NEI 2011 v1 GFR)



National PM10 Emissions by Source Sector

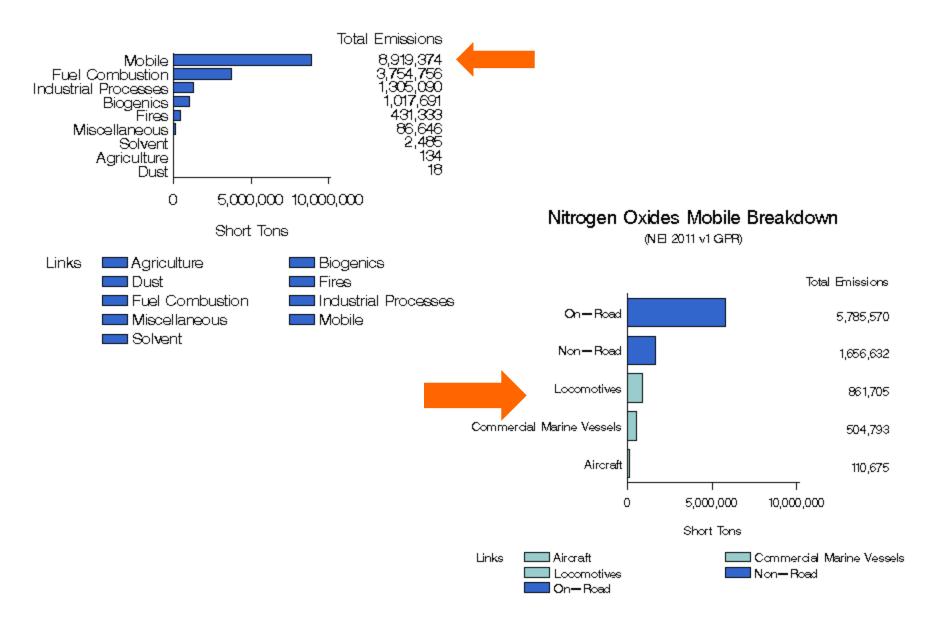
(NEI 2011 v1 GPR)

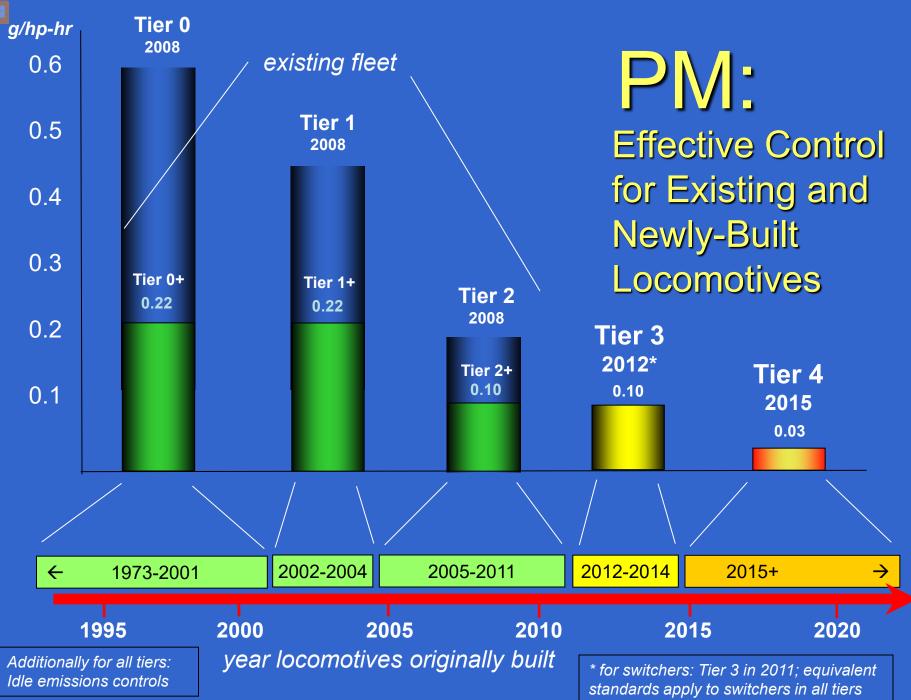


National Nitrogen Oxides Emissions by Source Sector

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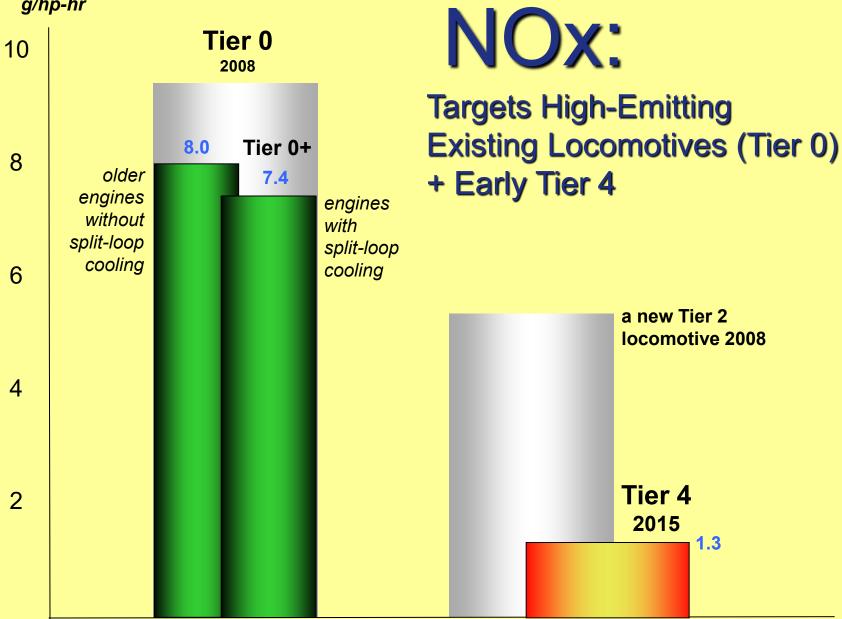
(NEI 2011 v1 GPR)





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g/hp-hr





BRACE YOURSELF!





LOCOMOTIVE RULE REQUIREMENTS: OVERVIEW

What standards must locomotives now meet?

- 1998: Original EPA standards for newlymanufactured locomotives (Tier 0, 1 & 2) and for remanufacturing existing locomotives built in 1973 or later.
- 2008: New EPA standards for locomotive & marine engines, including idle control for locomotives. Newly-manufactured locomotives meet Tier 3 & 4.
- 2010 & 2011: minor amendments to 2008 rule.

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TABLE 1 TO §1033.101-LINE-HAUL LOCOMOTIVE EMISSION STANDARDS

| | | S | tandards (g | g/bhp-hr) | |
|------------------------------|---------------------|-----|-------------------|-----------|-----|
| Year of original manufacture | Tier of standards | NOX | PM | HC | CO |
| 1973-1992ª | Tier 0 ^b | 8.0 | 0.22 | 1.00 | 5.0 |
| 1993 ^ª -2004 | Tier 1 ^b | 7.4 | 0.22 | 0.55 | 2.2 |
| 2005-2011 | Tier 2 ^b | 5.5 | ^e 0.10 | 0.30 | 1.5 |
| 2012-2014 | Tier 3° | 5.5 | 0.10 | 0.30 | 1.5 |
| 2015 or later | Tier 4 ^d | 1.3 | 0.03 | 0.14 | 1.5 |

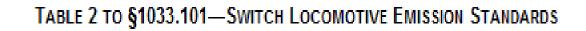
^aLocomotive models that were originally manufactured in model years 1993 through 2001, but that were not originally equipped with a separate coolant system for intake air are subject to the Tier 0 rather than the Tier 1 standards.

^bLine-haul locomotives subject to the Tier 0 through Tier 2 emission standards must also meet switch standards of the same tier.

^oTier 3 line-haul locomotives must also meet Tier 2 switch standards.

^dManufacturers may elect to meet a combined NO_X+HC standard of 1.4 g/bhp-hr instead of the otherwise applicable Tier 4 NO_X and HC standards, as described in paragraph (j) of this section.

^eThe PM standard for newly remanufactured Tier 2 line-haul locomotives is 0.20 g/bhp-hr until January 1, 2013, except as specified in §1033.150(a).



| | | S | tandards | g/bhp-hr) | |
|------------------------------|-------------------|-----------------|-------------------|-----------|-----|
| Year of original manufacture | Tier of standards | NO _X | PM | HC | CO |
| 1973-2001 | Tier 0 | 11.8 | 0.26 | 2.10 | 8.0 |
| 2002-2004 | Tier 1ª | 11.0 | 0.26 | 1.20 | 2.5 |
| 2005-2010 | Tier 2ª | 8.1 | ^b 0.13 | 0.60 | 2.4 |
| 2011-2014 | Tier 3 | 5.0 | 0.10 | 0.60 | 2.4 |
| 2015 or later | Tier 4 | °1.3 | 0.03 | °0.14 | 2.4 |

^aSwitch locomotives subject to the Tier 1 through Tier 2 emission standards must also meet line-haul standards of the same tier.

^bThe PM standard for new Tier 2 switch locomotives is 0.24 g/bhp-hr until January 1, 2013.

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^cManufacturers may elect to meet a combined NO_X+HC standard of 1.4 g/bhp-hr instead of the otherwise applicable. Tier 4 NO_X and HC standards, as described in paragraph (j) of this section.

Who must comply

- Manufacturers
- Remanufacturers
 - Suppliers
 - Installers
 - Owners who specify work
- Refurbishers
- Owners
 - Class I, II and IIIs (if owned by large parent co's)
 - Intercity passenger & commuter RRs

What locomotives are covered?

Regardless of application

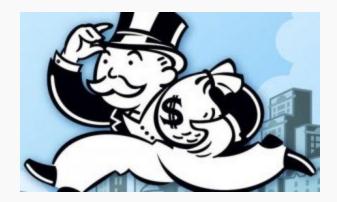


- Line haul and switch (< 2300 hp total)
- "Freshly manufactured" (less than 25% used parts)
- "Existing" regardless of age, when refurbished
- "Existing," 1973 or later vintage, when remanufactured



Small business exemption

- From remanufacturing/refurbishing standards
- For locomotives never certified to any Tier
- Idea: avoid costs of reconfiguring locomotive
- Must be owned AND operated by small biz
- Status of NE shortlines and Class IIs??



What is "Refurbishing?"

- A form of remanufacturing
- Overhauling a locomotive so more new than old
 - > 50% new or reconditioned parts, by value
 - New engine
- One-time event
- Pretty drastic, so
 - all vintages covered
 - standard for new engine somewhat higher than for simple remanufacture

What is "Remanufacturing"

- Varieties
 - Overhauling engine-- replacing every power assembly
 - Upgrading engine
 - Replacing engine
 - Converting to run on alt fuel
- Single event, or cumulative (over ≤ 5 years)
- Less drastic / sudden than refurbishing, so
 - triggers rule only for 1973+ vintage locomotives
 - standard for new engine somewhat lower than for refurbishing

What does the rule require?

- Certification to current applicable Tier
- Use a certified kit
- An idle reduction device that:
 - Shuts down engine after ≤ 30 min idling
 - Can stop/start ≥ 6 times/day without damage
 - Allows continued idling to
 - Prevent freezing
 - Maintain air pressure
 - Maintain battery
 - Perform maintenance
 - Comply with government regs
 - Heat or cool cab when necessary

GE Transportation Systems

Original Locomotive Emission Control Information

THIS LOCOMOTIVE MUST COMPLY WITH THESE EMISSION LEVELS EACH TIME THAT IT IS REMANUFACTURED EXCEPT AS ALLOWED BY 40 CFR 1033.750

Engine Family: EGETK0668EFF Engine Drawing Number: 41A113450G5

This engine family has been certified to Tier 1+ standards (Line-Haul NOx FEL = 7.4 g/bhp-hr and Switch NOx FEL = 11.0 g/bhp-hr) per 40 CFR Part 1033.101

Emissione



This engine and locomotive must be maintained per the procedures and materials documented in the operator and service manuals

All warranties and guarantees are defined in the owners contract GE Diesel Electric Locomotive Made in Erie, Pennsylvania, U.S.A.

AESS or APU or FOH

- Default is AESS, but specific hardware can vary
- APUs encouraged to reduce AESS restarts
- APU challenges:
 - Initial cost
 - Maintenance
 - Installation
 - Brake pressure
- APU success varies by:
 - Application & operations
 - Climate







LOCOMOTIVE STANDARDS & CERTIFICATION: DETAIL

What standards apply?

Depends on:

- Year locomotive was manufactured
- Tier of engine in the locomotive
- Power rating (> or < 2300 hp)
- Calendar year (if refurbishing).





| Year of Original Manufacture | Original Locomotive Tier | Minimum Tier for Remanufacture | | n Tier for ishment 2015 & later |
|---------------------------------|--------------------------------|-----------------------------------|-----|---------------------------------------|
| Pre-1973 | Unregulated | n/a* | 2+ | 4 |
| 1973-1992 | Tier 0 | 0+ | 2+ | 4 |
| 1993-2004 | 0 or 1 | 1+ | 2+ | 4 |
| 2005-2011 | 2 | 2+ | 2+ | 4 |
| 2012-2014 | 3 | 3 | 3 | 4 |
| 2015 & later | 4 | 4 | n/a | 4 |

*Don't have to meet any standards for a simple remanufacture, but have to meet Tier 0+ for a repower (new engine). Switch Locomotives

| Year of Original Manufacture | Original Locomotive Tier | Minimum Tier for Remanufacture | Minimum Tier for Refurbishment | | |
|---------------------------------|--------------------------------|-----------------------------------|--------------------------------|--------------|--|
| | | | Through 2014 | 2015 & later | |
| Pre-1973 | Unregulated | n/a* | 0+ | 3 | |
| 1973-2001 | Tier 0 | 0+ | 0+ | 3 | |
| 2002-2004 | 1 | 1+ | 1+ | 3 | |
| 2005-2010 | 2 | 2+ | 2+ | 3 | |
| 2011-2014 | 3 | 3 | 3 | 3 | |
| 2015 & later | 4 | 4 | n/a | 4 | |

*Don't have to meet any standards for a simple remanufacture, but have to meet Tier 0+ for a repower (new engine).

AGENCY

Engine certification data

| Engine Certification Data | Heavy Trucks, Buses, and | d Engines US EPA - Wind | dows Internet Explorer | and second party | | |
|------------------------------|----------------------------------|---------------------------|------------------------|--------------------|--------------------------------|----------------------|
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| | Locomotive C | compression- | Ignition Engines | Certification | Data | |
| | Engine Family and | d Models Informat | tion, and Certificatio | n Test Data, Farly | years are a Zip file of E | xcel files. |
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| | 2002, 2003, | 2006 & 2007 | | | File Edit View Favorites | Tools Help |
| | 2004, & 2005 | MYs (Zip) | MYs (Zip) | | 🔶 Favorites 🛛 🙀 | |
| | MYs (Zip) | (20K, April 2007) | (20K, May 2009) | | EPA Verify US EPA | |

2013 MY (XLS)

(90K, November 2013)

(20K, February 2006) 2010 MY (XLS)

(80K, March 2013)

2011 MY (XLS)

(70K, March 2013)

2012 MY (XLS)

(90K, March 2013)

| NCE & TECHNOLOGY LAWS & REGULATIONS ABOUT EPA SEARCH |
|---|
| I Vehicle Compliance System |
| You are here: EPA Home » Transportation and Air Quality » Verify |
| |
| EPA's engine and vehicle compliance information system, Verify, collects emissions and fuel economy compliance |
| information for all types of engines, vehicles, and equipment used in transportation and other mobile source applications. The Verify information system is used by engine and vehicle manufacturers to report this information to |
| EPA. Read more basic information. |
| This site describes the Verify information system in general. Manufacturers who need to use Verify to report to EPA must |
| first register with EPA to use the system. |
| The following page links provide more Verify information. |
| Basic Information: Learn more about the purpose of Verify. Frequent Questions: Find out answers to questions about Verify, such as: What is the first step manufacturers must complete in order to use the Verify system? and, What must a manufacture do to be able to submit data to Verify? Account Establishment: Read about how to stup a Verify account. Manufacturer Code: Learn how to register a company with FPA and acquire a manufacturer code. Publications: Read and download Verify related documents and presentations. Related Links: Find links to other certification and compliance activities. Calendar: See the schedule of system relaxes and upcoming events. |
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UNITED STATES

AGENCY

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ILLUSTRATIONS

Class III RR



- Pre-1973 locomotive, never before refurbished/certified: exempt because owner is small biz, but won't be if sold to larger biz
- Pre-1973 locomotive, already refurbished: same
- 1973+ locomotive, never before certified: same
- 1973+ locomotive, remanufactured/refurbished but not certified: same
- 1973+ locomotive, certified: standards apply

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Other RRs



- Pre-1973 locomotive, never before refurbished/certified: standards apply
- Pre-1973 locomotive, already refurbished: standards apply. Should be in compliance if refurb done after July 2008. Otherwise: next time
- 1973+ locomotive, never before certified: standards apply
- 1973+ locomotive, never before remanufactured/refurbished: standards apply
- 1973+ locomotive, reman/refurb: standards apply, and should be in compliance if > July 2008. Otherwise: next time.





FUEL

What fuel can you use?

- Earlier transition to ULSD in Northeast/Mid-Atlantic and AK than in rest of country
- As of 2012, everyone should be using only ULSD in any locomotive
- Transmix?
- Winter mix OK if ≤ 15 ppm sulfur
- 97% cleaner-better for people & engines

Fuel compliance issues

- Keep receipts
- Don't mix
- Label properly
- Provide spill protection
- EPA inspections: locomotives, yard equipment, storage tanks
 - Contamination
 - Mislabeling







LOCOMOTIVE

ULTRA-LOW SULFUR NON-HIGHWAY DIESEL FUEL (15 ppm Sulfur Maximum)

Required for use in all model year 2011 and later non-road diesel engines. Recommended for use in all other non-highway diesel engines. WARNING: Federal Law prohibits use in highway vehicles or engines.





LOCOMOTIVE RULE: COMPLIANCE & ENFORCEMENT

Ways to stay out of trouble

- Verify proper remanufacture/refurbish
 - Broad liability
 - Idle control
 - Certification
 - Labels
- Maintain engines & equipment







IMPORTANT ENGINE INFORMATION

THIS ENGINE CONFORMS TO U.S. EPA TIER 2+ REGULATIONS. THIS ENGINE IS DESIGNED TO OPERATE ON DIESEL FUEL. THIS ENGINE LOCOMOTIVE MUST BE MAINTAINED PER THE PROCEDURE AND MATERIALS DOCUMENTED IN THE THE PROCEDURE AND MATERIALS DOCUMENTED IN THE OPERATORS-OWNERS SERVICE MANUALS.



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GE Rail

| ES44AC |
|-------------|
| 4400 |
| 61069 |
| August 2012 |
| 416,000 lbs |
| |

Maintenance Instructions: GEK-80284

This engine and locomotive must be maintained per the procedures and materials documented in the locomotive maintenance instructions.

All warranties and guarantees are defined in the owners contract.

GE Diesel-Electric Locomotive Made in Erie, Pennsylvania, USA.

Original Locomotive Emission Control Information

This engine family has been certified to Tier 3 standards per 40 CFR part 1033.101.

THIS LOCOMOTIVE MUST COMPLY WITH THESE EMISSION LEVELS EACH TIME THAT IT IS REMANUFACTURED, EXCEPT AS ALLOWED BY 40 CFR 1033.750.

Engine Family: Engine Drawing Number: Emission Model:

CGETG0958EFB 41A113442G4 GEVO-T3

and a real



CONTRACTOR OF TAXABLE

THE OWNER ADDRESS OF TAXABLE PARTY.



THIS LOCOMOTIVE CONFORMS TO U.S. EPA TIER 3 REGULATIONS APPLICABLE TO 2012 AND LATER MODEL YEAR LOCOMOTIVE 2012 AND LATER MODEL TEAR LOODED TO ENGINES. THIS ENGINE IS DESIGNED TO OPERATE ON DIESEL FUEL. THIS ENGINE & LOCOMOTIVE MUST BE MAINTAINED PER THE PROCEDURE AND MATERIALS DOCUMENTED IN THE OPERATORS-OWNER-SERVICE MANUALS.

CAUTION AUTO START-STOP (AESS)

EQUIPPED LOCOMOTIVE Manual Shutdown disables AESS and will require a Manual Restart

CAUTION

FAILURE TO FOLLOW INSTRUCTIONS BELOW WILL DAMAGE LOCOTROL ELECTRONICS PROFITO THE HARDTITEST TURN OF ALL ORIGIT INFANTING 2 DECOMMENT COMPLETING MEDICALE 3 A. M. 1000 ART THE INFANTING ALL 8 AAX THE READ MEDICAL C THE AND YOU AT THE EPICIH MEDICAL

NOTICE

BATTERY SAVER EQUIPPED

or states and a state

A 1000 WARNING - This Locomotive may star any time automatically! Injury or death m if the following precautions are not follow to perform maintenance ,

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Unexpected engine startups whis may cause personal inpose All other standard railroad safetyroperating procedures must be followed.



LOAD SHED EQUIPPED





ATTENTION EMISSIONS CERTIFIED ENGINE

BEFORE PERFORMING ANY ADJUSTMENTS OR REPAIRS TO THIS DIESEL ENGINE CONTACT:

RAIL ROAD DIRECT OUTSIDE LINE

8-564-3888

FOR PROPER PARTS & PROCEDURE IDENTIFICATION

IMPORTANT ENGINE INFORMATION

THIS LOCOMOTIVE CONFORMS TO U.S. EPA TIER 3 REGULATIONS APPLICABLE TO 2012 AND LATER MODEL YEAR LOCOMOTIVE ENGINES THIS ENGINE IS DESIGNED TO OPERATE ON DISSEL FUEL THIS ENGINE & LOCOMOTIVE MUST BE MAINTAINED PER THE PROCEDURE AND MATERIALS DOCUMENTED IN THE OPERATORS-OWNERS-SERVICE MANUALS.



Manual Fuel Pressure Relief Valve Located on cylinder L1

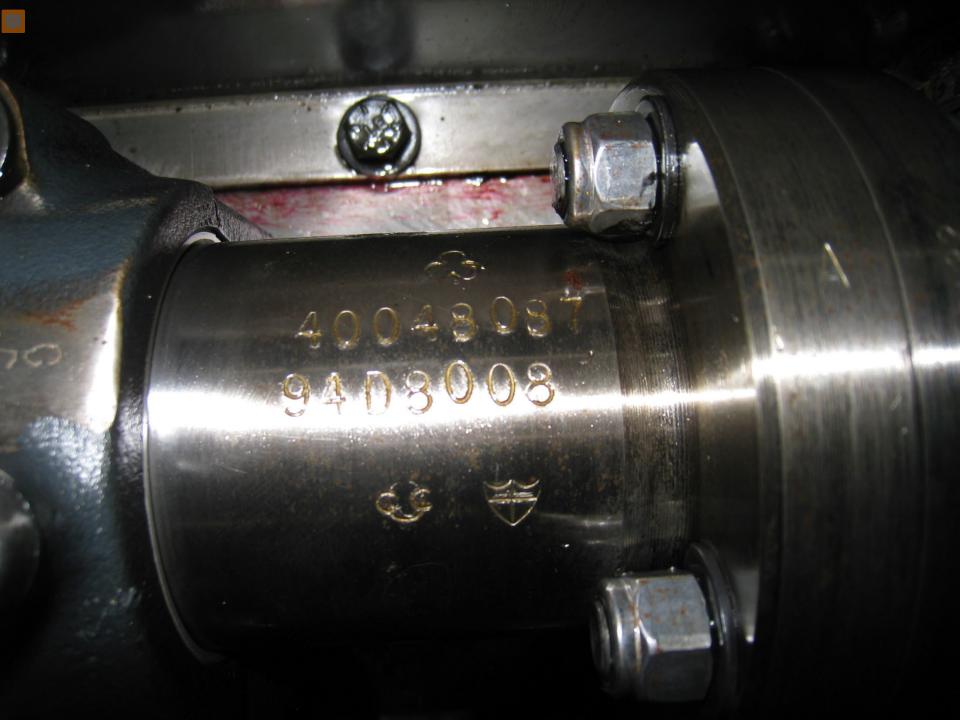
To relieve pressure with engine shut to reneve pressure with engine shift down, open T-handle for 5 seconds, before engine maintenance or repair. Close valve before starting engine to prevent fuel spill.



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Recordkeeping Roles

- Manufacturers: certificates for engines & kits
- Repair shops:
 - Remanufacture/refurbish:
 - Proper procedures & parts
 - Track all power assembly replacements
 - Maintenance
- Owner/operator:
 - Repair records
 - Maintenance records
 - "Small business" status



HK Engine Components, LLC. Item# 40028340-EPA-CSX CSX SCN# 260.0028340.2

 Mfg Date:
 11 JUN 2012

 War Exp:
 11 JUN 2013

EDI Genuine OEM Parts PWR AY PART NO. 40041462 PWR AY SERIAL NO. 12-E3-0327

CSX NO. 08-15 263.0041462.2

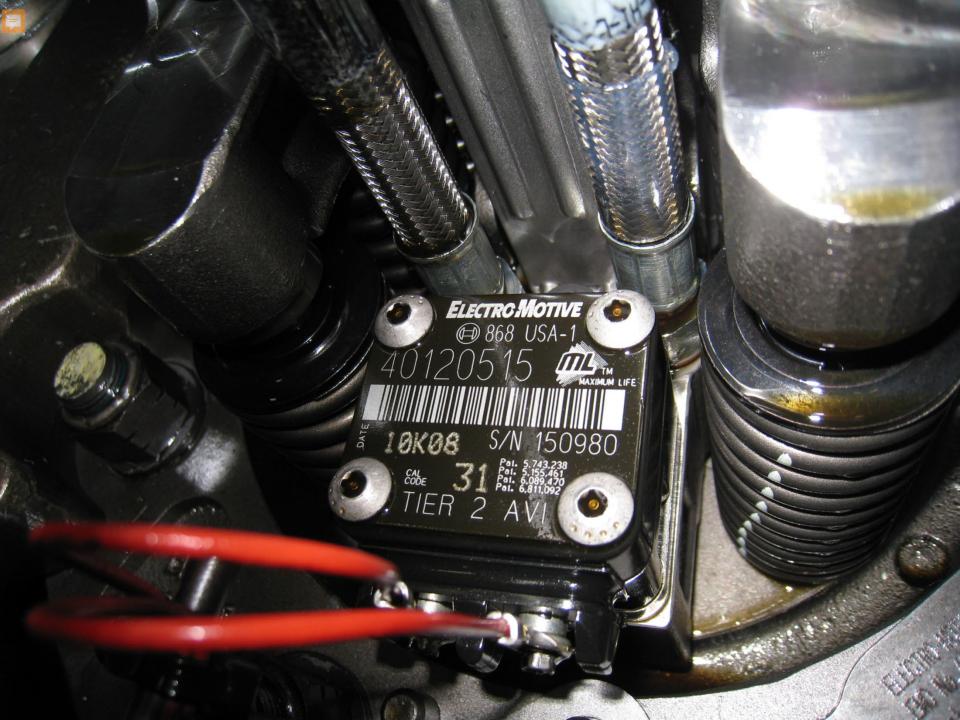
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ELECTINO-MOTIVE DIESELS EMD No. 40161516 Modeluin Cust. No. S/N-12H33738 Monufacture Date: 08/24/12

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848518272ALP22

AUTO ENGINE START/STOP SYSTEM (AESS)

- To de-activate the AESS system, move EC switch to JOG, open Aux Cab door, open the barrier bar or enter self-test. Pressing the Engine Stop button during an automatic shutdown does NOT de-activate the
- ALSS system. To Suspend (delay) AESS from auto stopping the engine, press and release the Auto Stop Suspend Switch (SASS). This may be identified as the Auto Stop Override Switch. Engaging Distributed Power may cause AESS to be inactive (this is a customer option; check with your railroad

- operations department).
 The engine must be auto stopped to qualify for an auto start. A manually stopped engine will NOT auto start.
 When testing or troubleshooting the AESS system, cycle BCCB after each Auto Stop.
 Three aborted Auto Stop attempts will temporarily render the AESS system inactive. Motoring the locomotive will set the AESS system back to active.
 Moving the EC switch to JOG, opening the ALX cab door/raising barrier bar or entering Settlett
- Will set the AESS system back to active.
 Moving the EC switch to JOG, opening the AUX cab door/raising barrier bar or entering Selflest during an auto stop cycle will cancel an auto start and require a manual start of the engine.
- CAUTION: Locomotive speed is ignored in isolated Trail units for Auto stop/start.

| STOP SSIONS e between 160°F 'F (110°C). erature between erd 110°F (43°C). | LOCO SET UP TRIGGERS * Reverser in center.* | 0 OCCUF OF TO REQUIRE MANUALS AUTO START PERMISSIONS • Ambient temperature not bet 40°F (4°C) and 120°F (4°C) |
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Inspections & Enforcement

- Inspecting certificate holders
- Complaints



- Penalties based on # locomotives, HP, etc
- HELP!
 - Larry Oeler 202-343-9289 or Michelle Ibarra 202-343-9318 (OTAQ)
- Self-disclosure and tips

- Mario Jorquera 202-564-1079 (OECA)



THANK YOU – QUESTIONS / DISCUSSION?

swaine.abby@epa.gov

617-918-1841