



“WE ARE FROM THE
GOVERNMENT AND WE ARE
HERE TO HELP”

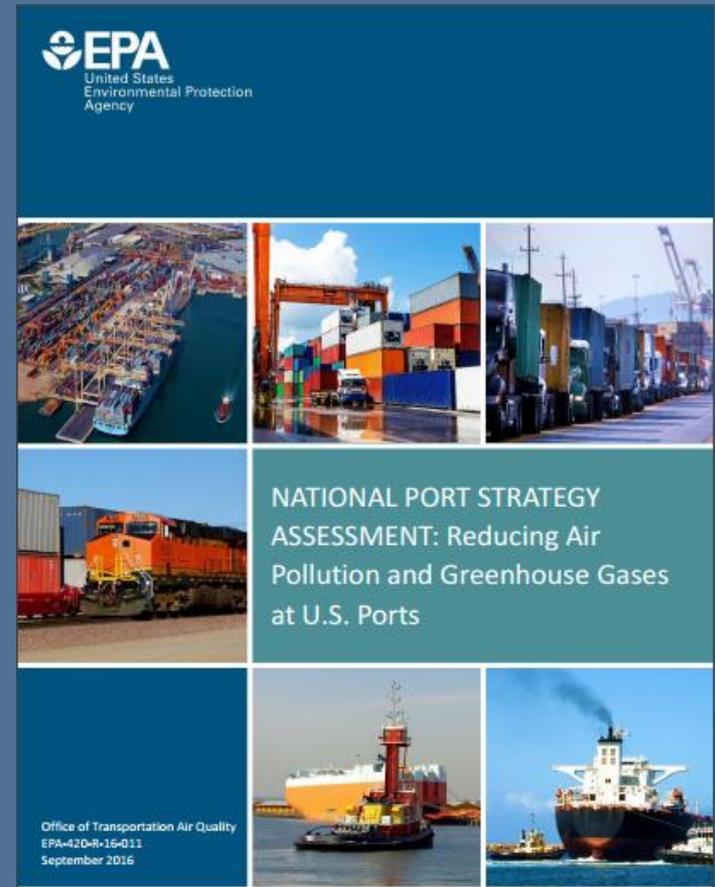
EPA's Guidance on Reducing Air Pollution and
Greenhouse Gases at U.S. Ports

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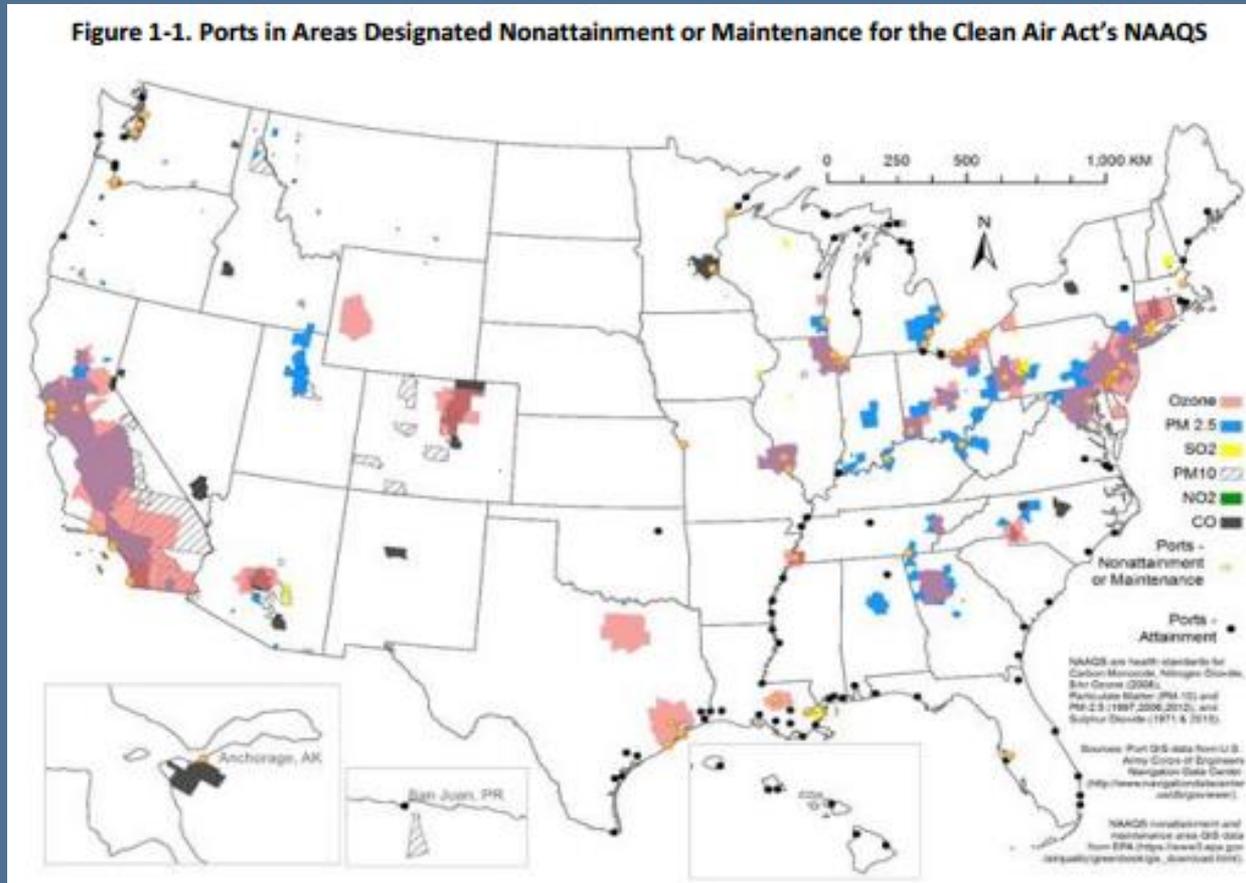
TOPICS

- Overview of EPA's Guidance
- Suggestions for Washington Ports
- Impact and Reach of EPA's Guidance



NATIONAL PORT STRATEGY ASSESSMENT

Figure 1-1. Ports in Areas Designated Nonattainment or Maintenance for the Clean Air Act's NAAQS



NATIONAL PORT STRATEGY ASSESSMENT

- Assessment of port-related emission trends
- Analysis of potential for emission reduction strategies
 - based on estimated emissions from a representative sample of 19 seaports.
 - The ports selected featured a range of diverse characteristics, such as different sizes, types of activity, and geographic location.

Table 2-2. Summary of Sources, Pollutants, and Geographic Area Covered by Assessment

Mobile Source Sector	Type of Emission Source	Pollutants Analyzed	Geographic Area Covered
Drayage Trucks	On-road Class 8 diesel trucks	NO _x , PM _{2.5} , VOCs, CO ₂ , BC, and select air toxics	All drayage activity within 0.5 km (0.3 mi) from port boundary.
Rail	Line-haul and switcher diesel locomotives	NO _x , PM _{2.5} , VOCs, CO ₂ , BC, and select air toxics	All rail activity within 0.5 km from port boundary.
CHE	Diesel-powered CHE	NO _x , PM _{2.5} , VOCs, CO ₂ , BC, and select air toxics	All CHE activity assumed to occur on-port.
Harbor Craft	Diesel-powered tugs and ferries	NO _x , PM _{2.5} , VOCs, CO ₂ , BC, and select air toxics	All harbor craft activity within 5 km (3 mi) from port boundary.
OGV	Diesel propulsion and auxiliary engines	NO _x , PM _{2.5} , VOCs, SO ₂ , CO ₂ , and BC	All OGV activity within 5 km from port boundary.

NATIONAL PORT STRATEGY ASSESSMENT

Basic Strategy

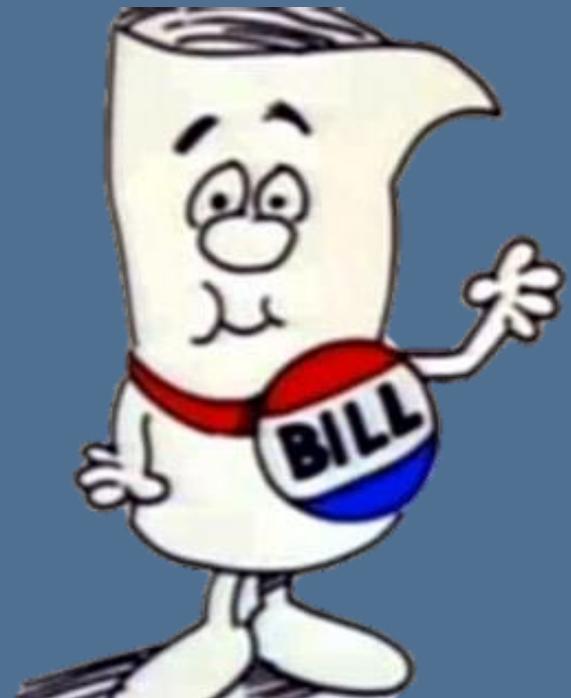
- Replace older, dirtier diesel vehicles and equipment first
- Reduction strategies differ based on the source.
- Includes strategies for different types and sizes of ports.

Table 1-2. Examples of Effective Port Strategies to Reduce NO_x and PM_{2.5} Emissions

Strategy Scenario	Percent reduction from BAU			
	NO _x		PM _{2.5}	
	2020	2030	2020	2030
Replace older drayage trucks	19–48%	48–60%	43–62%	34–52%
Replace older switcher locomotives	16–34%	17–43%	22–44%	24–47%
Replace older CHE	17–39%	13–25%	18–37%	12–25%
Replace or repower harbor craft	10–24%	25–38%	13–41%	28–37%
Reduce OGV hoteling emissions with shore power ¹⁶	4–9%	7–16%	3–8%	7–16%

VOLUNTARY MEASURES—REALLY?

- Watch out for Regulatory Creep:
 - How a guidance establishes standards
 - How a guidance becomes a law
 - How guidance infiltrates environmental review
- What we should do
 - Define your internal policy on emissions reductions
 - Be active—be aware of what works for your port and what does not (do not allow the regulators or third-parties to dictate what works for your port).



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"I love helping port clients serve their communities by broadening their local economic bases in an environmentally benign, cost-effective manner."

For 30 years, Walt Evans has helped Northwest ports, water carriers and waterfront businesses surmount legal and regulatory hurdles, both as a lawyer at Schwabe and as an advocate in Washington, D.C. Walt creates solutions for problems ranging from narrow regulatory issues to "bet the future" crises requiring complex, varied responses and skilled advocacy.

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Brien Flanagan helps marine terminals and public ports seek the permits, authorizations and financing they need to develop state-of-the-art facilities. He has advised clients in maritime industries on complex and controversial projects, including bulk storage facilities for ethanol, crude oil and coal, and groundbreaking fossil fuel export projects on the Columbia River.

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