Issues in Real-world Effectiveness of AESS & Other Idle Reduction Technologies

Abby Swaine, EPA Region 1 – New England 2023 FRA Workshop on Decarbonization of Rail Transportation



Context: EPA Regulatory & Voluntary Programs

- Locomotive Engine Rule
- Diesel Fuel Standards
- Clean Diesel Program
 - SmartWay
 - Ports Initiative
 - DERA
- Regional Implementation



Diesel Emissions Reduction Act (DERA) Funding









Note: "today" = 2008





Why try to minimize idling?

- Uphold the law
- Protect public health
- Attain ambient air quality standards
- Address hotspots
- Improve quality of life (noise, odors)
- Reduce GHGs

Tables from 2020 National Emissions Inventory,Locomotive Methodology

 Table 21.
 2017-2020 Yard Engine Fleet Composition Comparison

Tier	2020 Locomotive Count	2017 % of Fleet	2020 % of Fleet
0	673	23.61%	23.75%
0+	1,182	25.99%	41.71%
1	0	0.00%	0.00%
1+	26	4.76%	0.92%
2	7	2.33%	0.25%
2+	0	4.64%	0.00%
3	11	10.18%	0.39%
4	23	2.47%	0.81%
NC	912	26.01%	32.18%

Table 19. 2017-2020 Class II/III Fleet Profile Comparison

Class II/III Fleet Profiles					
Tier	2017 Locomotive Count	2020 Locomotive Count	2017 % of Fleet	2020 % of Fleet	
0	1,379	1,664	44%	48%	
1	7	31	0%	1%	
2	107	169	3%	5%	
3	118	160	4%	5%	
4	22	64	1%	2%	
NC	1,492	1,359	48%	39%	
Total	3,125	3,447	100%	100%	



METRIC		SWITCH	LINE HAUL	LINE HAUL DOING SWITCH
		(CA: 1,500-2,000 HP)	(defined by duty cycle & nigh HP)	(CA: 3,000-4,000 HP)
On-Duty Time (hr/yr)	CA	3,000	5,000	3,000 (inferred)
	EPA	4,450	4,350	4,450 (inferred)
Total Idling Time (hr/yr)	CA	1,800 (60% of on-duty time)	2,000 (40% of on-duty time)	1,800 (inferred)
	EPA	2,660 (60% of on-duty time)	1,650 (40% of on-duty time)	2,660 (inferred)
Discretionary Idling Time (hr/yr) (EPA: "low idle" time)	CA	900 (50% of total idling time)	?	900 (50% of total idling time)
	EPA	1,330 (50% of total idling time)	825 (50% of total idling time)	
Reduction (%) in Total Idling Time & Fuel Consumption due to	CA	<u>10-11</u>	<u>3</u>	10-11
AESS	EPA	<u>50</u>	<mark>50</mark>	50
CA = California Air Reso EPA = Regulatory Impac THIS IS NOT AN OFFIC	urces Board Estimates, ca. 2015; some et Analysis, 2008 Locomotive Rule. IAL EPA PRODUCT.	info based on GE, EMD & Chicago stud	dies.	







WHY **DO** LOCOMOTIVES IDLE?



Mechanical

- Equipment issues
 - breakdowns (locomotives, cars)
 - \circ weak batteries
 - worn starters
 - leaky brake lines*
 - worn compressors
- Safety/maintenance issues

 avoid doing FRA tests
 - maintain brake pressure readiness
 to avoid pre-trip failure

- Lack of idle reduction technology (AESS, APU, shore power, yard air)

 incompatible with engine (age, type) or facility layout
 not installed
 - $\,\circ\,$ insufficient to address locomotive /
 - crew needs
 - Malfunctioning





THE STATES

Meteorological

- freezing temps
- windy/wet/cold weather effects on exposed parts (some models)
- excessively hot temps
- delicate cab electronics need tighter temp control
- stranding due to snow or heat-warped rails





Spatial

- configuration
- capacity
- order
- road crossings & shared track
- construction-related delays



Operational

- Operator issues
 - yard or crew not adhering to operating plans or service bulletins
 - plans and bulletins outdated, confusing, too conservative, tardy, etc
 - $\circ~$ crew comfort in hot or cold weather
 - crew don't understand loco or idle
 equipment operation (especially when power sharing?)
 - $\circ~$ crew don't understand protocols
 - crew noncompliant (crew change or layover location, shutdown protocol, etc)

- Train scheduling
 - line congestion and tight schedule windows (freight, passenger)
 - \circ cascading delays
 - o premature arrival, delayed departure
 - fire or police officials order a train held short of destination
- Crew scheduling
 - $\circ~$ hours of service expire
 - \circ not enough operators
 - staffing practices (e.g., avoid paying overtime)





How EPA has tried to reduce idling

- Loco Engine Rule: outreach and enforcement
- DERA awards
- Ports Initiative: rail BMPs, inventory & strategies
- Field work



Genesee & Wyoming Railroad Services Inc. to Address Clean Air Act Violations in Settlement with United States

The Company Estimates it will Spend \$42 Million to Correct Violations and Offset Associated Environmental Harm

January 24, 2023





The Limits and Promise of AESS

- Limits
 - -Inherent
 - -As applied
- Promise
 - -2^{nd} generation
 - -Optional add-ons

CEPA United States Environmental Protection Agency			Q
Laws & Regulations 🗸	Report a Violation 🗸	About EPA 🗸	
for SmartWay and Cle	ean Diesel		CONTACT US
SmartWay Reduction	y Verified L Technolog	ist of Id gies (IR]	ling 's)
for Locom	ntives		,
Learn about Verified list			
The table below shows Sma	artWay Verified IRTs for locomo	tives.	
Technology types include:			
• AESS (Automatic Engine	e Shut-down/Start-up Systems)		
• APU/GS (Auxiliary Powe	r Units and Generator Sets)		
• FOH aka DFH (Fuel Ope	rated Heaters aka Direct Fired I	Heaters)	
SCS (Shore Connection	Systems)		
	Laws & Regulations V for SmartWay and Cle SmartWay and Cle SmartWay and Cle SmartWay and Cle SmartWay and Cle SmartWay Reduction for Locon Learn about Verified list The table below shows Sma Technology types include: AESS (Automatic Engine APU/GS (Auxiliary Powe FOH aka DFH (Fuel Ope SCS (Shore Connection	Restant Protection Laws & Regulations × Report a Violation × for SmartWay and Clean Diesel SpartWay Verified L Reduction Technology for Locomotives Learn about Verified list The table below shows SmartWay Verified IRTs for locomo Technology types include: • AESS (Automatic Engine Shut-down/Start-up Systems) • APU/GS (Auxiliary Power Units and Generator Sets) • FOH aka DFH (Fuel Operated Heaters aka Direct Fired I	Protection Search EPA.gov Laws & Regulations × Report a Violation × About EPA × for SmartWay and Clean Diesel SmartWay and Clean Diesel SmartWay Verified List of Idl Reduction Technologies (IRT) about Verified list Learn about Verified list The table below shows SmartWay Verified IRTs for locomotives. Learn about Verified list About SmartWay Verified IRTs for locomotives. Learn about Verified list The table below shows SmartWay Verified IRTs for locomotives. Learn about Verified list For Haka DFH (Fuel Operated Heaters aka Direct Fired Heaters) SCS (Shore Connection Systems)

-Combination with other IR: DWS, SCS, APU



Where do we go from here?

- Allow more state control over discretionary idling?
- Work more closely with STB on environmental impact statement review?
- Better characterize railyard equipment, activity and emissions to estimate impacts?
- Help RRs achieve sustainability goals in a way that matters locally, through...
 - Staffing facilities adequately and managing personnel
 - Maintaining & upgrading equipment
 - Improving yard configuration and management
 - Self-monitoring & planning
 - Communicating with communities
- Your ideas welcome! <a>otaq@epa.gov



