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Sent: January 13, 2011 at 4:15 pm

To: Locomotive Emissions Locomotives

Cc: Orban, Julie ENV:EX

Subject : Rolling towards a Cleaner Future – comments

I have reviewed the document “Rolling Towards a Cleaner Future: The Development of Canadian Emissions Regulation (Issue Brief) dated December 2010 and have only a few comments:

The sentence on page 11 “The NOx emissions trend line grew by only 3 percent over a period where the activity trend line grew by 38 percent” does not match that shown in Figure 2. Figure 2 shows only a 22% increase in total freight traffic between 1995 and 2005, whereas the NOx emissions for Rail operation did not show any trend.

The location of all locomotives retired should be documented as to where they are retired (i.e., moved from a line to a switcher, sold to a smaller company, or shipped to a scrap yard for recycling. This will help in tracking rail inventory for future emission calculations.

Yard switchers are the locomotives that should be targeted first. Typically when a locomotive is ‘retired’ it is transferred as a switcher. These switchers are mainly in major communities and are operating continuous in that community. They may not have as much greenhouse gas impact globally as line locomotives but they are the ones that will have the biggest air quality and health impacts in that air shed. Any locomotive emission reductions should include yard switchers. The impact of one locomotive on the health of the population in that air shed out weights the impact of one locomotive on the overall global climate change

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