

# Argentine Yard Emission Inventory

# BNSF Railway Company



## ARGENTINE YARD EMISSION INVENTORY

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## **Executive Summary**

E2 ManageTech, Inc. (E2) conducted an emission inventory for the BNSF Railway Company (BNSF) Argentine Facility (Facility) in Kansas City, Kansas. The purpose of this study was to identify and quantify on-site emissions generated from major source categories in 2008 and develop a comparison between estimated emissions currently generated at the Facility based on 2014 data.

The Facility operates as a hump yard and serves as a major hub where railcars are sorted and combined into destination specific trains. The Facility also operates as a maintenance yard servicing locomotives. In addition to locomotive emission sources, operational characteristics in 2008 included intermodal activities such as the trans-loading of containers to and from the yard. Therefore, the 2008 emission inventory is organized into the following major source categories:

- Emissions from on-site switching locomotives
- Line-haul locomotive emissions from the arrival and departure of trains at the Facility
- Locomotive emissions that occurred during maintenance activities
- Emissions generated from intermodal activity (truck trips and cargo handling equipment [CHE] )

On-site operational activities within the Argentine Facility in 2014 served primarily as a locomotive transfer facility and maintenance yard. Intermodal activities ceased operation in 2013. Therefore, emission categories quantified for 2014 include the following major sources:

- Emissions from on-site switching locomotives
- Line-haul locomotive emissions from the arrival and departure of trains at the Facility
- Locomotive emissions that occurred during maintenance activities

This emission inventory provides an estimate for six pollutants, reported as tons per year (tpy). The pollutants are Nitrogen Oxides (NOx), Particulate Matter less than 10 microns (PM10), Particulate Matter less than 2.5 microns (PM2.5)<sup>1</sup>, Hydrocarbons (HC), Carbon Monoxide (CO), and Sulfur Dioxide (SO2). A summary of results for 2008 and 2014 are provided in Table ES-1 and ES-2 respectively. Table ES-3 summarizes the 2014 percent reduction in emissions in comparison to the 2008 emission inventory

<sup>&</sup>lt;sup>1</sup> It was assumed that 97 percent of PM10 fugitive dust emissions are comprised of PM2.5. *Source: Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories (EPA, April 2009)* 



## Table ES-1: 2008 Emission Inventory

| Emissions (2008)                  |        |       |             |              |        |      |
|-----------------------------------|--------|-------|-------------|--------------|--------|------|
|                                   |        | Α     | nnual Emiss | ions (tons/y | r)     |      |
| On-Site Activity                  | NOx    | PM10  | PM2.5       | HC           | CO     | SO2  |
| Switching Locomotives             | 459.49 | 10.40 | 10.09       | 27.42        | 52.61  | 4.11 |
| Line Haul Locomotives Idling      | 15.17  | 0.46  | 0.44        | 0.81         | 2.39   | 0.20 |
| Maintenance Activity              | 94.46  | 2.13  | 2.07        | 2.88         | 9.78   | 0.12 |
| Truck Activity                    | 15.55  | 0.46  | 0.44        | 1.06         | 6.29   | 0.51 |
| Cargo Handling Equipment Activity | 53.28  | 5.77  | 5.60        | 7.97         | 159.75 | 1.65 |
| Total                             | 637.95 | 19.21 | 18.64       | 40.14        | 230.81 | 6.58 |

<sup>a</sup> It was assumed that 97 percent of PM10 fugitive dust emissions is comprised of PM2.5. Source: Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories (April 2009)

### Table ES-2: 2014 Emission Inventory

| Emissions (2014)                  |        |      |              |              |       |      |
|-----------------------------------|--------|------|--------------|--------------|-------|------|
|                                   |        | А    | nnual Emissi | ions (tons/y | r)    |      |
| On-Site Activity                  | NOx    | PM10 | PM2.5        | НС           | СО    | SO2  |
| Switching Locomotives             | 79.49  | 1.76 | 1.71         | 4.65         | 10.19 | 0.03 |
| Line Haul Locomotives Idling      | 9.09   | 0.24 | 0.24         | 0.41         | 1.79  | 0.01 |
| Maintenance Activity              | 70.55  | 1.91 | 1.85         | 2.35         | 3.97  | 0.01 |
| Truck Activity                    |        |      |              |              |       |      |
| Cargo Handling Equipment Activity |        |      |              |              |       |      |
| Total                             | 159.13 | 3.91 | 3.79         | 7.42         | 15.95 | 0.05 |

<sup>a</sup> It was assumed that 97 percent of PM10 fugitive dust emissions is comprised of PM2.5. Source: Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories (April 2009)

## Table ES-3: Percent Emissions Reduction in 2014 vs 2008

| Emissions Reduction (2014 vs 2008) |     |      |            |              |      |     |
|------------------------------------|-----|------|------------|--------------|------|-----|
|                                    |     | Emis | sions Redu | ction Percen | tage |     |
| On-Site Activity                   | NOx | PM10 | PM2.5      | HC           | CO   | SO2 |
| Switching Locomotives              | 83% | 83%  | 83%        | 83%          | 81%  | 99% |
| Line Haul Locomotives Idling       | 40% | 47%  | 47%        | 49%          | 25%  | 97% |
| Maintenance Activity               | 25% | 10%  | 10%        | 18%          | 59%  | 90% |
| Truck Activity                     |     |      |            |              |      |     |
| Cargo Handling Equipment Activity  |     |      |            |              |      |     |
| Overall Reduction                  | 75% | 80%  | 80%        | 82%          | 93%  | 99% |

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As shown in Table ES-3, the 2014 emission inventory in comparison to the 2008 inventory shows a decline in onsite emissions with a 75 percent reduction in NOx, 80 percent reduction in PM10 and PM2.5, 82 percent reduction in HC, 93 percent reduction in CO, and a 99 percent reduction in SO2. This can be attributed to the penetration of cleaner engines into the fleet and the introduction of idle reduction technologies. Additionally, the changes in on-site operations to no longer include intermodal activities resulted in reduced emissions generated at the Facility. Lastly, vast reductions in SO2 can be attributed to the Facility's use of a low sulfur diesel fuel.

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## Section 1 Introduction

E2 conducted an emission inventory for the BNSF Argentine Facility (Facility) in Kansas City, Kansas. This emission inventory and the associated on-site operational activity were limited to information collected in calendar years 2008 and 2014. Emission estimates are not intended to represent emissions in other years or emissions outside the realm of the major source categories described in Section 2 - Methodology.

It should be noted that in May 2010, ENVIRON prepared an emission inventory/projection for calendar years 2008, 2014, and 2020 for the Kansas Department of Health and Environment (KDHE), detailing the emissions generated from primary railroad operations in the Kansas City metropolitan area (ENVIRON, 2010). The 2010 ENVIRON study was regional in nature. The purpose of this particular study is to provide a detailed emission inventory of railroad operations specific to the Facility. Many of the assumptions used in the 2010 study were used to inform these emission estimates.

Operations at the Facility in 2008 included off-road equipment and on-road vehicles associated with intermodal activities and the trans-loading of containers within the Facility. These intermodal activities were moved to BNSF's Logistics Park Kansas City facility and therefore are not included in the emission inventory for 2014.



## Section 2 Methodology

## 2.1 Coordination of Information

E2 has prepared the emission inventory using site specific information provided by Matthew Brallier, General Foreman at the BNSF Argentine Facility. Input data from previous studies and/or technical memorandums were used when more precise inputs could not be estimated. E2 personnel performed a site walk at the Facility on Monday, August 24, 2015, in order to gather a comprehensive understanding of current operations. Additionally, in preparing this inventory, collaboration between E2 and BNSF was frequent and included numerous conference calls to discuss input factors and review the methodology.

## 2.2 Technical Approach

Emissions were estimated for five major source categories as described below.

**Switching Locomotives.** Switching locomotives or "switchers" play an integral role at the Argentine Facility and are required to help sort/assemble railcars within the yard. Switchers push freight cars up a small hill called a "hump" to a station where they are manually separated before they coast down and descend into a region known as the "bowl". On a cargo car's descent into the bowl, computers direct each car onto the appropriate track based on the car's destination. Additional switchers within the bowl are then utilized to assemble groups of cars and align them onto the appropriate departure track.

E2 estimated switching locomotives emissions using emission factors provided in the Technical Memorandum by the EPA titled, <u>Emission Factors for Locomotives</u> (EPA, 2009A). These emission factors include engine standards expected for normal fleet turnover and the penetration of cleaner engines, as well as the retrofit of existing engines. Emissions associated with switching locomotives were calculated using the formula below:

## *Emissions = (EF [g/gal]) x (Fuel Use [gal/hr]) x (Duration of Activity [hr/day]) x (Number of In-Service Locomotives)*

The 2008 switching locomotive characteristics (fuel use, operating hours, and observed counts) at the BNSF Facility were obtained from a railroad survey detailed in the study prepared for KDHE titled, <u>Development of Emission Estimates for Locomotives in the Kansas City Metropolitan Statistical Area</u> (ENVIRON, 2010).

The 2014 switching locomotive characteristics were provided by BNSF Railway Company as shown in Appendix A, Table A-1. The information provided included a weekly, in-service switching locomotive schedule at the Facility for calendar year 2015. For analysis purposes, these counts were assumed to be consistent with inservice switching locomotive characteristic at the Facility for calendar year 2014.

**Line-haul Locomotives.** Line-haul locomotives arriving/departing the Facility for refueling or for shift changes in personnel, generate emissions associated with engine idling. Line-haul locomotives idle during periods just after arrival and prior to departure. These emissions have been captured within the 2008 and 2014 emission inventories. It should be noted that there are instances in which line-haul locomotives do not stop at the Facility for refueling or shift changes, and merely pass through the facility. For analysis purposes, emissions associated with line-haul locomotives passing through the Facility have not been included within this analysis. Other Class I and passenger rail utilize these tracks and therefore are not explicit to BNSF or its operations. These emissions are assumed to be independent to the emissions generated on-site by the Facility and will be captured in



regional estimates similar to the 2010 ENVIRON study. Emissions associated with idling line-haul locomotives were calculated using the following formula:

*Emissions* = (*EF* [g/gal]) x (*Fuel Use* [gal/hr]) x (*Idling Time* [hr/locomotive]) x (*Number of Idling Locomotives*)

E2 estimated line-haul emissions using emission factors provided in the Technical Memorandum by the EPA titled, <u>Emission Factors for Locomotives</u> (EPA, 2009A).

The number of on-site idling line-haul locomotives per year and assumed fuel consumption analyzed in the 2008 and 2014 emission inventories were estimated based on conversation with BNSF personnel. Idling durations were based on the assumption that line-haul locomotives would idle for 0.50 hours at the Facility for refueling and minor inspections. Idling emission controls in the 2014 emission inventory would reduce idling times by 25 percent.

**Maintenance Activities.** The Facility includes a maintenance building where locomotives undergo scheduled maintenance such as engine load and opacity testing which generate a quantifiable amount of emissions. E2's methodology for estimating maintenance emissions from locomotives utilizes notch specific emission rates (g/hr) multiplied by the average time in notch profile for the corresponding maintenance activity. Notch specific emission rates were gathered from the <u>Port of Oakland Seaport Air Emissions Inventory</u> (ENVIRON, 2008).

## Emissions = (EF [g/hr per notch]) x (Time in Notch [hr/locomotive maintenance type]) x (Number of Locomotives [number of locomotives per maintenance type/yr)

The 2008 locomotive maintenance characteristics (test duration and observed counts) at the Facility were obtained from BNSF specific service data detailed in the <u>Development of Emission Estimates for Locomotives in</u> <u>the Kansas City Metropolitan Statistical Area</u> (ENVIRON, 2010). It is assumed that the average duration of full load tests occur for 45 minutes in notch 8. Opacity tests run through all 8 notches and idle profiles in approximately 40 minutes. Emission calculations associated with locomotive maintenance activities in the 2008 emission inventory utilized the average notch specific emission factors from the most popular line-haul engine models serviced.

In preparing the 2014 emission inventory, locomotive maintenance characteristics (test duration and observed counts) at the BNSF Facility were estimated based on a conversation with Matthew Brallier, the General Foreman at the Facility. It was assumed that full load tests occur for a duration of 30 minutes in notch 8. Opacity tests run through all notches with a test duration of approximately 3 minutes per notch. Emission calculations associated with locomotive maintenance activity in the 2014 emission inventory utilizes notch specific emission factors for the ES44 engine model, which was the most popular line-haul engine model serviced at the Facility in 2014.

**Truck Activities.** Truck emissions coincide with intermodal activity at the Argentine Facility and is thus characterized in the 2008 emission inventory only. Intermodal activity was not present at the Facility in 2014 and thus truck emissions have not been calculated in the 2014 inventory.

The most basic measure of truck activity is the number of truck trips that occur within the Facility, where a truck trip includes both an entrance and an exit by a truck. To estimate truck trips, BNSF provided 2008 lift counts for the Argentine intermodal yard as noted in the Development of Emission Estimates for Locomotives in the Kansas



<u>City Metropolitan Statistical Area</u> (ENVIRON, 2010). In order to calculate the number of two-way truck trips at the Facility in 2008, a ratio of 1.825 container lifts<sup>2</sup> to truck movements was utilized. This ratio determined the overall truck activity by creating a conversion which denotes the number of trucks that carried a container to and from the Facility as shown below:

## Number Truck Trips = (Lift Counts [lifts]) x (Conversion Factor [1.825 truck trips/lift])

The general approach used to estimate truck emissions was to characterize the truck trips within the Facility by estimating the trip mileage per road link and the idle duration at each link as shown in Appendix A - Table A-1. Emission rates for 2008 in-use diesel-powered heavy-duty trucks were utilized (EPA, 2008). In-use truck activity emissions were calculated using the following formula:

## *Emissions = (EF [g/mile]) x (Trip Length [miles/truck trip]) x (Frequency [truck trips/yr])*

Idle emission rates utilized in this analysis were based on national data representing the in-use fleet of heavyduty trucks as of July 2008 (EPA, 2008A). Emissions associated with trucks idling at the entrance queue, within the yard, and at the exit queue are calculated as follows:

## *Emissions = (EF [g/hr]) x (Idling time [hr/truck trip]) x (Frequency [truck trips/yr])*

**Cargo Handling Equipment (CHE).** Cargo handling equipment was associated with intermodal activities at the Argentine Facility in 2008. Intermodal activity was not present at the Facility in 2014 and thus CHE emissions have not been calculated in the 2014 emission inventory.

CHE is used to move cargo to and from railcars and on-road trucks. CHE activity estimates (equipment count, horsepower, model year, and average running hours) were provided by BNSF, as noted in the <u>Development of Emission Estimates for Locomotives in the Kansas City Metropolitan Statistical Area</u> (ENVIRON, 2010). Emissions associated with CHE were calculated using the following formula:

*Emissions = (EF [g/hp-hr]) x (Equipment Count) x (Horsepower) x (Load Factor) x (Operational Activity [hr/year])* 

CHE emission factors are a function of the following formula:

## *EF* = *Zero Hour Emissions Rate* + (*Deterioration Rate x Cumulative Hours*)

The zero hour emission rate (g/hp-hr) is the emission rate when an engine is new and without any component degradation for the equipment model year. Zero hour emission rates were sourced from the <u>Development of Emission Estimates for Locomotives in the Kansas City Metropolitan Statistical Area</u> (ENVIRON, 2010). The deterioration rate was used to calculate the change in emissions as a function of equipment age and reduced efficiency attributed to wear of various engine parts.

<sup>&</sup>lt;sup>2</sup> Source: <u>Development of Emission Estimates for Locomotives in the Kansas City Metropolitan Statistical Area</u> (ENVIRON 2010)





For CHE equipment, E2 staff estimated the change in emissions over the useful life of the equipment's engine by using the equation for deterioration rate as shown below:

Deterioration Rate = (Deterioration Factor x Zero Hour Emission Rate) / Cumulative hours of useful life

Deterioration factors utilized in this analysis were sourced from the <u>Exhaust and Crankcase Emission Factors for</u> <u>Nonroad Engine Modeling – Compression-Ignition</u> (EPA, 2010). Cumulative hours of useful life were obtained from the emissions factors assessment analyzed in the <u>Development of Emission Estimates for Locomotives in</u> <u>the Kansas City Metropolitan Statistical Area</u> (ENVIRON, 2010).



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## Section 3 Calculations

Inventory of emissions generated by on-site major source categories within the Argentine Facility have been calculated for calendar years 2008 and 2014. The emissions analyzed are limited to the spatial domain of the Argentine facility as shown on Figure 1. Calculations for each major source category are described in Section 2.2 - Technical Approach. Additional detailed calculations are presented in Appendix B.



## Section 4 Results and Comparisons

Emission inventories for 2008 and 2014 are presented in Tables 4-1 and 4-2.

## Table 4-1: 2008 Emission Inventory

| Emissions (2008)                  |        |       |              |              |        |      |
|-----------------------------------|--------|-------|--------------|--------------|--------|------|
|                                   |        | Α     | nnual Emissi | ions (tons/y | r)     |      |
| On-Site Activity                  | NOx    | PM10  | PM2.5        | НС           | СО     | SO2  |
| Switching Locomotives             | 459.49 | 10.40 | 10.09        | 27.42        | 52.61  | 4.11 |
| Line Haul Locomotives Idling      | 15.17  | 0.46  | 0.44         | 0.81         | 2.39   | 0.20 |
| Maintenance Activity              | 94.46  | 2.13  | 2.07         | 2.88         | 9.78   | 0.12 |
| Truck Activity                    | 15.55  | 0.46  | 0.44         | 1.06         | 6.29   | 0.51 |
| Cargo Handling Equipment Activity | 53.28  | 5.77  | 5.60         | 7.97         | 159.75 | 1.65 |
| Total                             | 637.95 | 19.21 | 18.64        | 40.14        | 230.81 | 6.58 |

<sup>a</sup> It was assumed that 97 percent of PM10 fugitive dust emissions is comprised of PM2.5. Source: Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories (April 2009)

|--|

| Emissions (2014)                  |        |      |             |              |       |      |
|-----------------------------------|--------|------|-------------|--------------|-------|------|
|                                   |        | A    | nnual Emiss | ions (tons/y | r)    |      |
| On-Site Activity                  | NOx    | PM10 | PM2.5       | HC           | СО    | SO2  |
| Switching Locomotives             | 79.49  | 1.76 | 1.71        | 4.65         | 10.19 | 0.03 |
| Line Haul Locomotives Idling      | 9.09   | 0.24 | 0.24        | 0.41         | 1.79  | 0.01 |
| Maintenance Activity              | 70.55  | 1.91 | 1.85        | 2.35         | 3.97  | 0.01 |
| Truck Activity                    |        |      |             |              |       |      |
| Cargo Handling Equipment Activity |        |      |             |              |       |      |
| Total                             | 159.13 | 3.91 | 3.79        | 7.42         | 15.95 | 0.05 |

<sup>a</sup> It was assumed that 97 percent of PM10 fugitive dust emissions is comprised of PM2.5. Source: Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories (April 2009)

It should be noted that on-site switching locomotive activity is an extensive emission source for both the 2008 and 2014 emission inventories. The 2008 inventory utilizes actual switching survey observations characteristic of the Facility in 2008 as provided within the <u>Development of Emission Estimates for Locomotives in the Kansas</u> <u>City Metropolitan Area</u> (ENVIRON, 2010). Survey results from the ENVIRON study indicated 28 on-site switching locomotives operating for 12 hours a day. To determine current switcher usage, E2 performed an on-site walk conducted in conjunction with discussion with BNSF staff at the Facility. This revealed that current operations include an average of 9 switching locomotives adapted with idle technology operating for 12 hours a day. Thus, differences in assumed on-site switching locomotive activity within the 2008 and 2014 inventories have resulted in further decreases in 2014 switching locomotive emissions in comparison to the 2008 emission inventory.

Notwithstanding, all major source categories within calendar year 2014 show a decrease in emissions when compared to emissions generated at the Facility in 2008. This can be attributed to the following reasons:



## **Introduction of Cleaner Burning Engines**

When comparing the 2014 emission inventory to 2008 emissions, the reduction in emissions can be attributed to the introduction of regulatory requirements which involved adopting more stringent emission standards in locomotives and the penetration of cleaner engines into the fleet. Therefore, 2014 emission factors declined in comparison to those utilized in the 2008 inventory due to the introduction of newer, less polluting, higher tiered engines. Thus, natural fleet turnover and rebuilding of older engines to meet regulatory compliance requirements, resulted in less emissions generated in 2014.

## **Locomotive Idle Reduction Technologies**

Locomotive engines may need to idle in order to maintain critical functions such as air pressure for the braking and starting systems and battery charge. Additionally, locomotives may idle to supply air-conditioning or heat to its crew, in order to comply with regulations and contractual requirements related to working conditions for the crew. The majority of locomotives at the Facility in 2014 include idle reduction technologies that reduce emissions by 25 percent. BNSF locomotives have installed Automatic Engine Start-Stop systems (AESS) which aid in helping reduce emissions associated with locomotives idling by shutting down the engine after a set idle time (15 minutes). AESS systems monitor critical functions and will start-up a shutdown engine if need be.

## **Change on Facility Operational Activity**

A reduction in emissions within the 2014 emission inventory can also be attributed to a change in operational activity at the Facility. Intermodal activities at the Facility were eliminated in 2013, leading to a decrease in onsite emissions. Therefore, the elimination of 605,051 annual on-site truck trips and 146,740 cumulative annual cargo handling equipment running hours, have resulted in a decrease in Facility related emissions.

## **Use of Cleaner Fuels**

SO2 emissions at the Facility in 2014 resulted in drastic reductions in SO2 in comparison to 2008 levels. This is attributed to the implementation schedule of locomotive fuel regulations requiring the switch to a low sulfur diesel fuel. Therefore, in calendar year 2014, more stringent fuel standards were in effect that were not required in 2008. With the use of cleaner burning fuels, sulfur levels were reduced from 351 ppm sulfur in 2008 to 15 ppm sulfur in 2014. This reduction in fuel sulfur content combined with cleaner burning engines resulted in the dramatic decrease in SO2 emissions.



## Section 5 Conclusions

The 2014 emission inventory results in a reduction for all emissions when compared to the 2008 inventory. Table 4-3 details the percentage decrease in emissions based on activity type.

|                                   |     | Emis | sions Reduc | tion Percent | tage |     |
|-----------------------------------|-----|------|-------------|--------------|------|-----|
| On-Site Activity                  | NOx | PM10 | PM2.5       | HC           | СО   | SO2 |
| Switching Locomotives             | 83% | 83%  | 83%         | 83%          | 81%  | 99% |
| Line Haul Locomotives Idling      | 40% | 47%  | 47%         | 49%          | 25%  | 97% |
| Maintenance Activity              | 25% | 10%  | 10%         | 18%          | 59%  | 90% |
| Truck Activity                    |     |      |             |              |      |     |
| Cargo Handling Equipment Activity |     |      |             |              |      |     |
| Overall Reduction                 | 75% | 80%  | 80%         | 82%          | 93%  | 99% |

## Table 4-3: Percent Emissions Reduction in 2014 vs 2008

It should be noted that differences in on-site switching locomotive activity within the 2008 and 2014 inventories have resulted in decreased emissions associated with switching locomotives. Based on conversation with BNSF staff and site walk observations, E2 does not find the 2008 switching survey to be representative of 2014 switching locomotive operations at the Facility. Therefore, the 2014 emission inventory analyzed 9 switching locomotives adapted with idle technology operating at 12 hours a day as opposed to 28 locomotives operating at 12 hours a day. Differences in on-site switching locomotive activity within the 2008 and 2014 emission inventories have thus resulted in further reductions in 2014 on-site switching locomotive emissions.

Overall, the 2014 emission inventory in comparison to the 2008 emission inventory shows a decline in on-site emissions with a 75 percent reduction in NOx, 80 percent reduction in PM10 and PM2.5, 82 percent reduction in HC, 93 percent reduction in CO, and a 99 percent reduction in SO2. This can be attributed to the introduction of idle reduction technologies and the penetration of cleaner engines into the fleet. Additionally, the changes in on-site operations to no longer include intermodal activities resulted in reduced emissions generated at the Facility. Lastly, vast reductions in SO2 can be attributed to Facility's switch to using a low sulfur diesel fuel. Notwithstanding, it is expected that locomotive emission rates will decrease overtime due to the introduction of cleaner locomotives. Newer engines that meet more stringent standards will eventually replace the older engine fleet. Thus, a reduction in locomotive emissions per horsepower hour will occur with the penetration of higher tiered engines.



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## Section 6 References

- BNSF 2015. Personal communication with Matthew Brallier, General Foreman at BNSF Railway Company, August 24, 2015.
- ENVIRON 2008. "Port of Oakland 2005 Seaport Air Emissions Inventory," March 14, 2008.
- ENVIRON 2010. "Development of Emission Estimates for Locomotives in the Kansas City Metropolitan Statistical Area" August 8, 2007.
- EPA 1998. "Locomotive Emission Standards," Regulatory Support Document, Office of Mobile Sources, EPA-420-R-98-101, April 1998.
- EPA 2002. "Analysis of BSFCs and Calculation of Heavy-Duty Engine Conversion Factors," Office of Transportation and Air Quality, EPA420-R-02-005, January 2002.
- EPA 2004. "Clean Air Nonroad Diesel Rule," Regulatory Announcement, Office of Transportation and Air Quality, EPA420-F-04-032, May 2004.
- EPA 2008. "Average In-Use Emissions from Heavy-Duty Trucks," Office of Transportation and Air Quality, EPA420-F-08-027, October 2008.
- EPA 2008A. "Idling Vehicle Emissions for Passenger Cars, Light-Duty Trucks, and Heavy-Duty Trucks," Office of Transportation and Air Quality, EPA420-F-08-025, October 2008.
- EPA 2009. "Current Methodologies in Preparing Mobile Source port Related Emission Inventories," Office of Policy, Economics and Innovation, April 2009.
- EPA 2009A. "Emission Factors for Locomotives," Office of Transportation and Air Quality, EPA- 420-F-09-025, April 2009.
- EPA, 2009. "Suggested Nationwide Average Fuel Properties," EPA-420-B-09-018 April 2009.
- EPA 2010. "Construction Fleet Inventory Guide," Office of Transportation and Air Quality, EPA-420-B-10-025, July 2010.
- EPA 2010. "Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling Compression-Ignition," Office of Transportation and Air Quality, EPA-420-R-10-018, July 2010.
- U.S. Department of Energy 2011. "Biomass Energy Data Book", Edition 4, September 2011 Available online at http://cta.ornl.gov/bedb/pdf/BEDB4\_Full\_Doc.pdf.

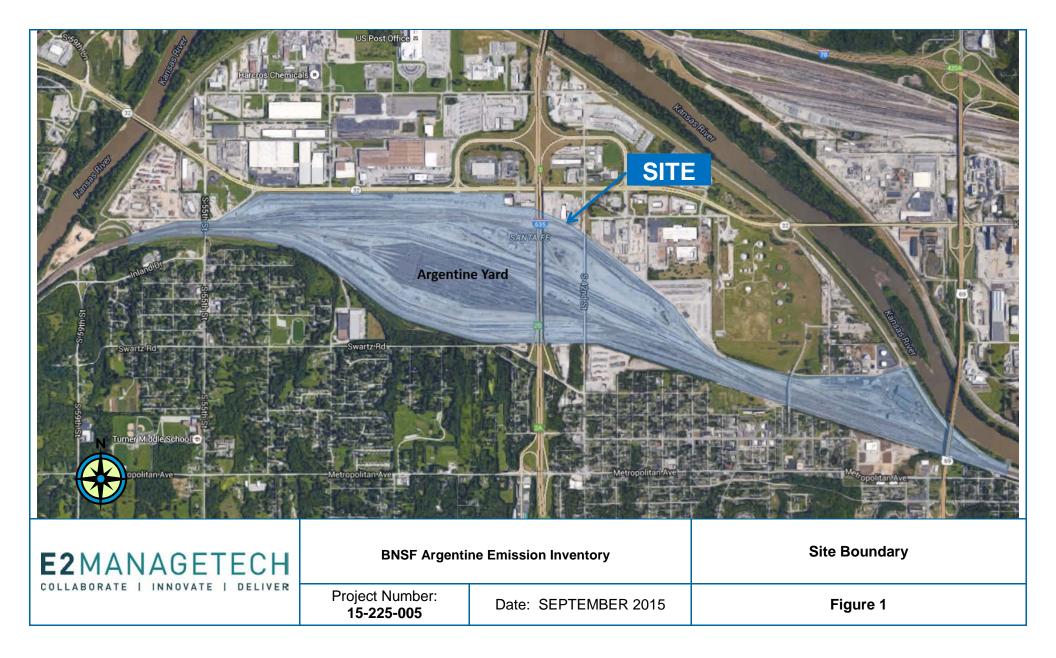




## **Figures**

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### BNSF Argentine Emissions Inventory 2008 Assumptions

| On-site Emissions from Switching Locomotive  | IS  | <u>Comments</u>   |
|--|-----|---|
| # of switching locomotives (locomotives/day) |     | Based on the switching survey results for the Argentine Facility obtained from the <u>Development of Emission Estimates for</u><br>Locomotives in the Kansas City Metropolitan Statistical Area (ENVIRON 2010)  |
| Switcher activity frequency (days/year)      | 365 | Locomotives in the Kansas City Metropolitan Statistical Area (Envirion 2010)  |
| Duration of activity (hrs/day)               | 12  | Based on the switching survey results for the Argentine Facility obtained from the <u>Development of Emission Estimates for</u><br>Locomotives in the Kansas City Metropolitan Statistical Area (ENVIRON 2010)  |
| Fuel consumption (gal/hr)                    | 14  | Based on the switching survey results for the Argentine Facility obtained from the Development of Emission Estimates for<br>Locomotives in the Kansas City Metropolitan Statistical Area (ENVIRON 2010) The average of 14 gallons per hour (in-service and<br>idling fuel consumption) was used in the KDHE study and represents the average fuel consumption of "locomotive engines<br>rated at 2000 to 2500 hp more typical of those used in Kansas City". The average fuel consumption for the following engine<br>models were used EMD 12-645E3B and EMD 16-645E. |

| Line-Haul Locomotive Idling Emissions               |     | Comments   |
|---|-----|--|
| # of idling line-haul locomotives (locomotives/day) | 112 | Assumed that the number of trains stopping for refueling or inspection were 50% of the number of all locomotives passing<br>through          |
| Line-haul frequency (days/year)                     | 365 |  |
| Idle time (hrs/locomotive)                          | 0.5 | 30 minutes for fueling and minor inspection. Based on conversation with Matthew Brallier, General Foreman at the BNSF<br>Argentine Facility. |
| Fuel usage while at idle (gal/hr)                   | 4   | Based on information from Matthew Brallier, General Foreman at the BNSF Argentine Facility   |

| Maintenance Emissions   |      | Comments   |  |  |
|---|------|--|--|--|
| # of locomotives serviced for full load test (locomotives/yr) | 1122 | Based on the maintenance survey for the Argentine Facility obtained from the <u>Development of Emission Estimates for</u><br>Locomotives in the Kansas City Metropolitan Statistical Area (ENVIRON 2010) |  |  |
| # of locomotives serviced for opacity test (locomotives/yr)   |      | Based on the maintenance survey for the Argentine Facility obtained from the <u>Development of Emission Estimates for</u><br>Locomotives in the Kansas City Metropolitan Statistical Area (ENVIRON 2010) |  |  |
| Full Load Test Duration (hrs/test)                            | 0.75 | KDHE study (ENVIRON 2010)  |  |  |
| Opacity Test Duration (hrs/test)                              | 0.67 | KDHE study (ENVIRON 2010)  |  |  |
| Fuel usage (gal/hr)   | 29   | Based on information from Matthew Brallier, General Foreman at the BNSF Argentine Facility   |  |  |

| Truck Emissions               |  | Comments  |  |  |
|-------------------------------|--|---|--|--|
| # of lifts/year 331,535       |  | A lift is a movement of a container from or to a train. 2008 counts at BNSF Argentine Facility                                |  |  |
| # of truck trips/year 605.051 |  | Estimated ratio of truck movement to lifts was estimated to be 1.825 by the Development of Emission Estimates for truck trips |  |  |
|                               |  | in the Kansas City Metropolitan Statistical Area (ENVIRON 2010)   |  |  |

| Activity Description | Distance (mi) | Idle Duration (hr) |
|----------------------|---------------|--------------------|
| Entrance Queue       | 0.10          | 0.05               |
| Argentine Yard       | 2.00          | 0.11               |
| Exit Queue           | 0.10          | 0.01               |

### BNSF Argentine Emissions Inventory 2008 Emission Factors

|                      | Emission Factors <sup>a</sup> (g/gal) |                   |      |       |  |
|----------------------|---------------------------------------|-------------------|------|-------|--|
| Locomotive Type      | NOx <sup>b</sup>                      | PM10 <sup>b</sup> | HC b | co '  |  |
| Line Haul Locomotive | 169                                   | 5.1               | 9    | 26.6  |  |
| Switcher Locomotive  | 243                                   | 5.5               | 14.5 | 27.82 |  |

<sup>a</sup> The emission factors reflects the penetration of the various tiers of locomotives in the fleet over time as referenced in EPA-420-F-09-025, April 2009. % Turnover of new locomotives ranged from 3-5% yearly <sup>b</sup> Source: Expected line-haul/switcher fleet average emission factors in 2014 (EPA-420-F-09-025, April 2009)

<sup>c</sup> Source: EPA-420-R-98-101, April 1998. Note: Emission rates were originally in g/hp-hr. Pursuant to guidance 20.8 bhp-hr/gal for line-haul locomotives and 15.2 bhp-hr/gal for switchers CO emission rates were not expected to change with emission controls

| Locomotive Fuel Type                     | Diesel |
|--|--------|
| Fuel Sulfur Content (ppm) <sup>a</sup>   | 351    |
| Fuel Density (g/gal) <sup>b</sup>        | 3167   |
| Conversion Factor <sup>c</sup>           | 97.80% |
| SO2 Emission Factor (g/gal) <sup>d</sup> | 2.17   |

Suggested Nationwide Average Fuel Properties in 2008 (EPA-420-B-09-018, April 2009) <sup>b</sup> Source: http://cta.ornl.gov/bedb/appendix\_a/Lower\_and\_Higher\_Heating\_Values\_of\_Gas\_Liquid\_and\_Solid\_Fuels.pdf
<sup>c</sup> Fraction of sulfur fuel converted to SO2 (EPA-420-F-09-025, April 2009)

<sup>d</sup> SO2 (g/gal) = (fuel density) x (conversion factor) x (64 g SO2/32 g S) x (S content of Fuel)

|  | -      | 1     |       | r      |
|--|--------|-------|-------|--------|
| Truck Activity <sup>a</sup>  | NOx    | PM10  | HC    | co     |
| In-Use (g/mile) <sup>b</sup>   | 8      | 0.219 | 0.453 | 2.311  |
| Idle (g/hr) <sup>c</sup>   | 33.763 | 1.196 | 3.503 | 25.628 |
| <sup>a</sup> Diesel heavy-duty truck emission factors are based on national average data representing the in-use fleet as of July 2008 |        |       |       |        |

<sup>b</sup> Average In-use Emission from Heavy-Duty Trucks (EPA420-F-08-027, October 2008)

<sup>c</sup> Idling Vehicle Emissions for Passenger Cars, Light-Duty Trucks, and Heavy-Duty Trucks (EPA420-F-08-025, October 2008)

| Truck Fuel Type                          | Diesel |
|--|--------|
| Fuel Sulfur Content (ppm) <sup>a</sup>   | 351    |
| Fuel Density (g/gal) <sup>b</sup>        | 3167   |
| Conversion Factor <sup>c</sup>           | 97.80% |
| SO2 Emission Factor (g/gal) <sup>d</sup> | 2.17   |
| Fuel Economy (mpg) <sup>e</sup>          | 6.3    |

<sup>a</sup> Suggested Nationwide Average Fuel Properties in 2008 (EPA-420-B-09-018, April 2009)

<sup>b</sup> Source: http://cta.ornl.gov/bedb/appendix\_a/Lower\_and\_Higher\_Heating\_Values\_of\_Gas\_Liquid\_and\_Solid\_Fuels.pdf

<sup>c</sup> Fraction of sulfur fuel converted to SO2 (EPA-420-F-09-025, April 2009)

<sup>d</sup> SO2 (g/gal) = (fuel density) x (conversion factor) x (64 g SO2/32 g S) x (S content of Fuel)

<sup>e</sup> Source: EPA420-R-02-005

### **BNSF Argentine Emissions Inventory 2014 Assumptions**

| On-site Emissions from Switching Locomoti    | ves   |  |
|--|-------|--|
| # of switching locomotives (locomotives/day) | 9     | 5 Bowl Power Locomotives; 4 Hump Unit  |
| Switcher activity frequency (days/year)      | 365   |  |
| Duration of activity (hrs/day)               | 11.25 | 9 hours in service and 3 hours idling. Credit taken  |
| Fuel consumption (gal/hr)                    | 9     | Based on conversation with Matthew Brallier, Gee<br>for an on-site hump switcher which records its fue |

| Line-Haul Locomotive Idling Emissions               |       |  |
|---|-------|--|
| # of idling line-haul locomotives (locomotives/day) | 112   | Took a 7 day count of all locomotives entering th<br>were 50% of the number of all locomotives passi   |
| Line-haul frequency (days/year)                     | 365   |  |
| Idle time (hrs/locomotive)                          | 0.375 | 30 minutes for fueling and minor inspection. Bas<br>Argentine Facility. Credit taken for a 25% reducti |
| Fuel usage while at idle (gal/hr)                   | 4     | Based on information from Matthew Brallier, Ge   |

| Maintenance Emissions   |      |   |
|---|------|---|
| # of locomotives serviced for full load test (locomotives/yr) | 6420 | Based on counts provided by Matt for locomotive<br>scheduled maintenance (366). It was noted that t                     |
| # of locomotives serviced for opacity test (locomotives/yr)   | 1189 | Based on information from Matthew Brallier, Ge<br>scheduled maintenance which requires opacity to<br>ES44 engine models |
| Full Load Test Duration (hrs/test)                            | 0.50 | Based on conversation Matthew Brallier, General   |
| Opacity Test Duration (hrs/test)                              | 0.50 | 8 notches ~3 minutes per notch  |
| Fuel usage (gal/hr)   | 29   | Based on information from Matthew Brallier, Ger   |

### BNSF Argentine Emissions Inventory 2014 Emission Factors

|                      | Emission Factors <sup>a</sup> (g/gal) |        |                 |       |
|----------------------|---------------------------------------|--------|-----------------|-------|
| Locomotive Type      | NOx <sup>b</sup>                      | PM10 b | HC <sup>b</sup> | °, co |
| Line Haul Locomotive | 135                                   | 3.6    | 6.1             | 26.6  |
| Switcher Locomotive  | 217                                   | 4.8    | 12.7            | 27.82 |

\*The emission factors reflects the penetration of the various tiers of locomotives in the fleet over time as referenced in EPA-420-F-09-025, April 2009. % Turnover of new locomotives ranged from 3-5% yearly

<sup>b</sup> Source: Expected line-haul/switcher fleet average emission factors in 2014 (EPA-420-F-09-025, April 2009)

<sup>c</sup> Source: EPA-420-R-98-101, April 1998. Note: Emission rates were originally in g/hp-hr. Pursuant to guidance 20.8 bhp-hr/gal for line-haul locomotives and 15.2 bhp-hr/gal for switchers CO emission rates were not expected to change with emission controls

| Fuel Type <sup>a</sup>                   | Low Sulfur Diesel |
|--|-------------------|
| Fuel Sulfur Content (ppm)                | 15                |
| Fuel Density (g/gal) <sup>b</sup>        | 3206              |
| Conversion Factor <sup>c</sup>           | 97.80%            |
| SO2 Emission Factor (g/gal) <sup>d</sup> | 0.09              |

Pursuant to the Clean Air Nonroad Diesel Rule, locomotives are assumed to be fueled with low sulfur diesel in 2014 <sup>b</sup> Source: http://cta.oml.gov/bedb/appendix\_a/Lower\_and\_Higher\_Heating\_Values\_of\_Gas\_Liquid\_and\_Solid\_Fuels.pdf <sup>c</sup> Fraction of sulfur fuel converted to SO2 (EPA-420-F-09-025, April 2009)

<sup>d</sup> SO2 (g/gal) = (fuel density) x (conversion factor) x (64 g SO2/32 g S) x (S content of Fuel)

| Comments . |  |  |
|------------|--|--|
|            |  |  |
|            |  |  |
|            |  |  |

aken for a 25% reduction in idling emissions based on idling technology

General Foreman at the BNSF Argentine Facility. Analyzed fuel consumption data s fuel consumption (in-service and idling).

Comments the facility. Assumed that the number of trains stopping for refueling or inspection

ssing through

ased on conversation with Matthew Brallier, General Foreman at the BNSF tion in idling emissions based on idling technology eneral Foreman at the BNSF Argentine Facility

### Comments

ives coming in for unscheduled testing (6054) + all locomotives coming in for 92 day at the majority of maintenance activity was for ES44 engine models

eneral Foreman at the BNSF Argentine Facility. Took counts of the 368 day testing to be done. It was noted that the majority of maintenance activity was for

al Foreman at the BNSF Argentine Facility

eneral Foreman at the BNSF Argentine Facility



### **BNSF Argentine Emissions Inventory 2008 CHE Assumptions**

| Equipment Type <sup>a</sup> | Model Year <sup>a</sup> | Horsepower <sup>a</sup> | Running Hrs/ Year <sup>a</sup> | Load Factor <sup>a</sup> | Fuel Consumption<br>(gal/year) <sup>b</sup> | Cumulative<br>Hours <sup>a</sup> | Median<br>Life <sup>a</sup> | Zero Ho | our Emissic | on Rates (g | /hp-hr) <sup>a</sup> | D     | eterioratio | on Factors <sup>c</sup> |                | Deterioration | đ           |             | EF (g/           | hp-hr)            |      | EF (g/gal) |                  |
|-----------------------------|-------------------------|-------------------------|--------------------------------|--------------------------|---|----------------------------------|-----------------------------|---------|-------------|-------------|----------------------|-------|-------------|-------------------------|----------------|---------------|-------------|-------------|------------------|-------------------|------|------------|------------------|
|                             |                         |                         |                                |                          |   |                                  |                             | NOx     | PM10        | HC          | со                   | NOx   | PM10        | нс                      |                | PM10          | нс          | со          | Nox <sup>e</sup> | PM10 <sup>e</sup> | HC ° | CO °       | SO2 <sup>f</sup> |
| Hostler                     | 2005                    | 152                     | 3180                           | 0.59                     | 11531                                       | 15900                            | 4667                        | 4.03    | 0.23        | 0.35        | 1.33                 | 0.009 | 0.473       | 0.034 0.                |                |               | 1.27491E-06 |             | 4.09             | 0.42              | 0.37 | 1.56       | 2.17             |
| Hostler                     | 2005                    | 152                     | 3180                           | 0.59                     | 11531                                       | 15900                            | 4667                        | 4.03    | 0.23        | 0.35        | 1.33                 | 0.009 | 0.473       | 0.034 0.                |                |               | 1.27491E-06 | 1.43915E-05 | 4.09             | 0.42              | 0.37 | 1.56       | 2.17             |
| Hostler                     | 2005                    | 152                     | 3180                           | 0.59                     | 11531                                       | 15900                            | 4667                        | 4.03    | 0.23        | 0.35        | 1.33                 | 0.009 | 0.473       | 0.034 0.                |                |               |             |             | 4.09             | 0.42              | 0.37 | 1.56       | 2.17             |
| Hostler                     | 2005                    | 152                     | 3180                           | 0.59                     | 11531                                       | 15900                            | 4667                        | 4.03    | 0.23        | 0.35        | 1.33                 | 0.009 | 0.473       | 0.034 0.                |                | 5 1.16552E-05 |             |             | 4.09             | 0.42              | 0.37 | 1.56       | 2.17             |
| Hostler                     | 2005                    | 152                     | 3180                           | 0.59                     | 11531                                       | 15900                            | 4667                        | 4.03    | 0.23        | 0.35        | 1.33                 | 0.009 | 0.473       | 0.034 0.                | 101 3.88579E-0 | 5 1.16552E-05 | 1.27491E-06 | 1.43915E-05 | 4.09             | 0.42              | 0.37 | 1.56       | 2.17             |
| Hostler                     | 2006                    | 152                     | 3180                           | 0.59                     | 11531                                       | 12720                            | 4667                        | 4.03    | 0.23        | 0.35        | 1.33                 | 0.009 | 0.473       | 0.034 0.                | 01 3.88579E-0  | 5 1.16552E-05 | 1.27491E-06 | 1.43915E-05 | 4.08             | 0.38              | 0.37 | 1.51       | 2.17             |
| Hostler                     | 2006                    | 152                     | 3180                           | 0.59                     | 11531                                       | 12720                            | 4667                        | 4.03    | 0.23        | 0.35        | 1.33                 | 0.009 | 0.473       | 0.034 0.                | 01 3.88579E-0  | 5 1.16552E-05 | 1.27491E-06 | 1.43915E-05 | 4.08             | 0.38              | 0.37 | 1.51       | 2.17             |
| Hostler                     | 2006                    | 152                     | 3180                           | 0.59                     | 11531                                       | 12720                            | 4667                        | 4.03    | 0.23        | 0.35        | 1.33                 | 0.009 | 0.473       | 0.034 0.                | 01 3.88579E-0  | 5 1.16552E-05 | 1.27491E-06 | 1.43915E-05 | 4.08             | 0.38              | 0.37 | 1.51       | 2.17             |
| Hostler                     | 2006                    | 152                     | 3180                           | 0.59                     | 11531                                       | 12720                            | 4667                        | 4.03    | 0.23        | 0.35        | 1.33                 | 0.009 | 0.473       | 0.034 0.                |                |               | 1.27491E-06 | 1.43915E-05 | 4.08             | 0.38              | 0.37 | 1.51       | 2.17             |
| Hostler                     | 2006                    | 152                     | 3180                           | 0.59                     | 11531                                       | 12720                            | 4667                        | 4.03    | 0.23        | 0.35        | 1.33                 | 0.009 | 0.473       | 0.034 0.                |                |               | 1.27491E-06 |             | 4.08             | 0.38              | 0.37 | 1.51       | 2.17             |
| Hostler                     | 2006                    | 152                     | 3180                           | 0.59                     | 11531                                       | 12720                            | 4667                        | 4.03    | 0.23        | 0.35        | 1.33                 | 0.009 | 0.473       | 0.034 0.                |                |               |             | 1.43915E-05 | 4.08             | 0.38              | 0.37 | 1.51       | 2.17             |
| Hostler                     | 2006                    | 152                     | 3180                           | 0.59                     | 11531                                       | 12720                            | 4667                        | 4.03    | 0.23        | 0.35        | 1.33                 | 0.009 | 0.473       | 0.034 0.                |                | 5 1.16552E-05 |             |             | 4.08             | 0.38              | 0.37 | 1.51       | 2.17             |
| Hostler                     | 2006                    | 152                     | 3180                           | 0.59                     | 11531                                       | 12720                            | 4667                        | 4.03    | 0.23        | 0.35        | 1.33                 | 0.009 | 0.473       | 0.034 0.                |                | 5 1.16552E-05 |             |             | 4.08             | 0.38              | 0.37 | 1.51       | 2.17             |
| Hostler                     | 2006                    | 152                     | 3180                           | 0.59                     | 11531                                       | 12720                            | 4667                        | 4.03    | 0.23        | 0.35        | 1.33                 | 0.009 | 0.473       | 0.034 0.                | 101 3.88579E-0 | 5 1.16552E-05 | 1.27491E-06 | 1.43915E-05 | 4.08             | 0.38              | 0.37 | 1.51       | 2.17             |
| Hostler                     | 2007                    | 152                     | 3180                           | 0.59                     | 11531                                       | 9540                             | 4667                        | 2.89    | 0.23        | 0.21        | 1.33                 | 0.008 | 0.473       | 0.027 0                 | 151 2.47697E-0 | 1 165526-05   | 6.074576-07 | 2 1516E-05  | 2.91             | 0.34              | 0.22 | 1.54       | 2.17             |
| Hostler                     | 2007                    | 152                     | 3180                           | 0.59                     | 11531                                       | 9540                             | 4667                        | 2.89    | 0.23        |             | 1.33                 | 0.008 | 0.473       |                         | L51 2.47697E-0 |               |             |             | 2.91             | 0.34              | 0.22 | 1.54       | 2.17             |
| Hostler                     | 2007                    | 152                     | 3180                           | 0.59                     | 11531                                       | 9540                             | 4667                        | 2.89    | 0.23        |             |                      |       |             |                         | 151 2.47697E-0 |               |             |             | 2.91             | 0.34              | 0.22 | 1.54       | 2.17             |
|                             |                         |                         | •                              |                          |   |                                  |                             |         |             |             |                      |       |             |                         |                |               |             |             |                  | · · ·             |      |            |                  |
| Hostler                     | 2008                    | 152                     | 3180                           | 0.59                     | 11531                                       | 6360                             | 4667                        | 2.89    | 0.23        | 0.21        | 1.33                 | 0.008 | 0.473       |                         |                | 5 1.16552E-05 |             | 2.1516E-05  | 2.91             | 0.30              | 0.21 | 1.47       | 2.17             |
| Hostler                     | 2008                    | 152                     | 3180                           | 0.59                     | 11531                                       | 6360                             | 4667                        | 2.89    | 0.23        | 0.21        | 1.33                 | 0.008 | 0.473       | 0.027 0.                |                |               |             | 2.1516E-05  | 2.91             | 0.30              | 0.21 | 1.47       | 2.17             |
| Hostler                     | 2008                    | 152                     | 3180                           | 0.59                     | 11531                                       | 6360                             | 4667                        | 2.89    | 0.23        | 0.21        | 1.33                 | 0.008 | 0.473       | 0.027 0.                |                |               |             | 2.1516E-05  | 2.91             | 0.30              | 0.21 | 1.47       | 2.17             |
| Hostler                     | 2008                    | 152                     | 3180                           | 0.59                     | 11531                                       | 6360                             | 4667                        | 2.89    | 0.23        | 0.21        | 1.33                 | 0.008 | 0.473       | 0.027 0.                |                | 5 1.16552E-05 |             | 2.1516E-05  | 2.91             | 0.30              | 0.21 | 1.47       | 2.17             |
| Hostler                     | 2008                    | 152                     | 3180                           | 0.59                     | 11531                                       | 6360                             | 4667                        | 2.89    | 0.23        | 0.21        | 1.33                 | 0.008 | 0.473       | 0.027 0.                |                |               |             |             | 2.91             | 0.30              | 0.21 | 1.47       | 2.17             |
| Hostler                     | 2008                    | 152                     | 3180                           | 0.59                     | 11531                                       | 6360                             | 4667                        | 2.89    | 0.23        | 0.21        | 1.33                 | 0.008 | 0.473       | 0.027 0.                | 2.47697E-0     | 5 1.16552E-05 | 6.07457E-07 | 2.1516E-05  | 2.91             | 0.30              | 0.21 | 1.47       | 2.17             |
| Hostler                     | 2009                    | 152                     | 3180                           | 0.59                     | 11531                                       | 3180                             | 4667                        | 2.61    | 0.32        | 0.19        | 1.33                 | 0.008 | 0.473       | 0.027 0                 | 151 2.23698E-0 | 1 6216E-05    | 5.49604E-07 | 2.1516E-05  | 2.62             | 0.37              | 0.19 | 1.40       | 2.17             |
| Hostler                     | 2009                    | 152                     | 3180                           | 0.59                     | 11531                                       | 3180                             | 4667                        | 2.61    | 0.32        | 0.19        | 1.33                 | 0.008 | 0.473       |                         |                |               |             |             | 2.62             | 0.37              | 0.19 | 1.40       | 2.17             |
| Hostler                     | 2009                    | 152                     | 3180                           | 0.59                     | 11531                                       | 3180                             | 4667                        | 2.61    | 0.32        | 0.19        | 1.33                 | 0.008 | 0.473       | 0.027 0.                | 151 2.23698E-0 | 5 1.6216E-05  | 5.49604E-07 | 2.1516E-05  | 2.62             | 0.37              | 0.19 | 1.40       | 2.17             |
| Hostler                     | 2009                    | 152                     | 3180                           | 0.59                     | 11531                                       | 3180                             | 4667                        | 2.61    | 0.32        | 0.19        | 1.33                 | 0.008 | 0.473       | 0.027 0.                | 151 2.23698E-0 | 5 1.6216E-05  | 5.49604E-07 | 2.1516E-05  | 2.62             | 0.37              | 0.19 | 1.40       | 2.17             |
| Hostler                     | 2009                    | 152                     | 3180                           | 0.59                     | 11531                                       | 3180                             | 4667                        | 2.61    | 0.32        | 0.19        | 1.33                 | 0.008 | 0.473       | 0.027 0.                |                |               | 5.49604E-07 | 2.1516E-05  | 2.62             | 0.37              | 0.19 | 1.40       | 2.17             |
| Hostler                     | 2009                    | 152                     | 3180                           | 0.59                     | 11531                                       | 3180                             | 4667                        | 2.61    | 0.32        | 0.19        | 1.33                 | 0.008 | 0.473       | 0.027 0.                | 151 2.23698E-0 | 5 1.6216E-05  | 5.49604E-07 | 2.1516E-05  | 2.62             | 0.37              | 0.19 | 1.40       | 2.17             |
| Hostler                     | 2009                    | 152                     | 3180                           | 0.59                     | 11531                                       | 3180                             | 4667                        | 2.61    | 0.32        | 0.19        | 1.33                 | 0.008 | 0.473       | 0.027 0.                | 151 2.23698E-0 | 5 1.6216E-05  | 5.49604E-07 | 2.1516E-05  | 2.62             | 0.37              | 0.19 | 1.40       | 2.17             |
| Hostler                     | 2009                    | 152                     | 3180                           | 0.59                     | 11531                                       | 3180                             | 4667                        | 2.61    | 0.32        | 0.19        | 1.33                 | 0.008 | 0.473       | 0.027 0.                |                |               | 5.49604E-07 | 2.1516E-05  | 2.62             | 0.37              | 0.19 | 1.40       | 2.17             |
| Hostler                     | 2009                    | 152                     | 3180                           | 0.59                     | 11531                                       | 3180                             | 4667                        | 2.61    | 0.32        | 0.19        | 1.33                 | 0.008 | 0.473       | 0.027 0.                |                |               |             | 2.1516E-05  | 2.62             | 0.37              | 0.19 | 1.40       | 2.17             |
| Hostler                     | 2009                    | 152                     | 3180                           | 0.59                     | 11531                                       | 3180                             | 4667                        | 2.61    | 0.32        | 0.19        | 1.33                 | 0.008 | 0.473       | 0.027 0.                | 2.23698E-0     | 5 1.6216E-05  | 5.49604E-07 | 2.1516E-05  | 2.62             | 0.37              | 0.19 | 1.40       | 2.17             |
| Mobile Repair Van           | 2004                    | 225                     | 1500                           | 0.3                      | 9924  | 9000                             | 4500                        | 2.11    | 0.06        | 1.00        | 50.76                | 0.009 | 0.473       | 0.034 0.                | 0.0000021      | 1 3.15333E-06 | 3.77778E-06 | 0.00056964  | 2.13             | 0.09              | 1.03 | 55.89      | 2.17             |
| Mobile Repair Van           | 1998                    | 225                     | 1500                           | 0.3                      | 9924  | 18000                            | 4500                        | 8.43    | 0.06        | 5.01        | 155.50               | 0.024 | 0.473       | 0.036 0.                | 0.0000224      | 3.15333E-06   | 0.00002004  | 0.001745056 | 8.83             | 0.12              | 5.37 | 186.91     | 2.17             |
| Mobile Repair Van           | 1998                    | 225                     | 1500                           | 0.3                      | 9924  | 18000                            | 4500                        | 8.43    | 0.06        | 5.01        | 155.50               | 0.024 | 0.473       | 0.036 0.                |                |               | 0.00002004  |             | 8.83             | 0.12              | 5.37 | 186.91     | 2.17             |
| Mobile Repair Van           | 1998                    | 225                     | 1500                           | 0.3                      | 9924  | 18000                            | 4500                        | 8.43    | 0.06        | 5.01        | 155.50               | 0.024 | 0.473       | 0.036 0.                |                | 0.200002.00   | 0.00002004  | 0.000.0000  | 8.83             | 0.12              | 5.37 | 186.91     | 2.17             |
| Mobile Repair Van           | 1998                    | 225                     | 1500                           | 0.3                      | 9924  | 18000                            | 4500                        | 8.43    | 0.06        | 5.01        | 155.50               | 0.024 | 0.473       | 0.036 0.                | 0.0000224      | 3.15333E-06   | 0.00002004  | 0.001745056 | 8.83             | 0.12              | 5.37 | 186.91     | 2.17             |
| Mobile Repair Van           | 1998                    | 225                     | 1500                           | 0.3                      | 9924  | 18000                            | 4500                        | 8.43    | 0.06        | 5.01        | 155.50               | 0.024 | 0.473       | 0.036 0.                | 0.0000224      | 3.15333E-06   | 0.00002004  | 0.001745056 | 8.83             | 0.12              | 5.37 | 186.91     | 2.17             |
| Mobile Repair Van           | 1998                    | 225                     | 1500                           | 0.3                      | 9924  | 18000                            | 4500                        | 8.43    | 0.06        | 5.01        | 155.50               | 0.024 | 0.473       | 0.036 0.                | 0.0000224      | 3.15333E-06   | 0.00002004  | 0.001745056 | 8.83             | 0.12              | 5.37 | 186.91     | 2.17             |
| Rubber Tire Gantry Crane    | 1998                    | 220                     | 3000                           | 0.21                     | 19848                                       | 36000                            | 4667                        | 6.15    | 0.50        | 0.71        | 1.92                 | 0.024 | 0.473       | 0.036 0.                | 1.58132E-0     | 5 2.53375E-05 | 2.73838E-06 | 2.07757E-05 | 6.72             | 1.41              | 0.81 | 2.67       | 2.17             |
|                             |                         |                         |                                | 0.01                     | 10010                                       | 57000                            | 1007                        | 0.05    | 0.70        | 1.80        |                      | 0.004 | 0.170       | 0.047                   |                |               |             | 0.000107551 |                  | 0.07              | 0.01 |            | 0.17             |
| Rubber Tire Gantry Crane    | 1991                    | 220                     | 3000                           | 0.21                     | 19848                                       | 57000                            | 4667                        | 9.25    | 0.79        | 1.56        | 6.94                 | 0.024 | 0.473       | 0.047 0.                | 2.3784E-0      | 4.00332E-05   | 7.85515E-Ub | 0.000137551 | 10.61            | 3.07              | 2.01 | 14.78      | 2.17             |
| Rubber Tire Gantry Crane    | 1993                    | 220                     | 3000                           | 0.21                     | 19848                                       | 51000                            | 4667                        | 9.25    | 0.79        | 1.56        | 6.94                 | 0.024 | 0.473       | 0.047 0.                | 2.3784E-0      | 5 4.00332E-05 | 7.85515E-06 | 0.000137551 | 10.46            | 2.83              | 1.96 | 13.96      | 2.17             |
| Rubber Tire Gantry Crane    | 2000                    | 315                     | 3000                           | 0.21                     | 36111                                       | 30000                            | 7000                        | 6.64    | 0.40        | 0.46        | 3.36                 | 0.024 | 0.473       | 0.036 0.                | 1.13829E-0     | 5 1.35143E-05 | 1.18286E-06 | 0.00002424  | 6.98             | 0.81              | 0.50 | 4.09       | 2.17             |
| Rubber Tire Gantry Crane    | 2004                    | 315                     | 3000                           | 0.21                     | 36111                                       | 18000                            | 7000                        | 4.97    | 0.27        | 0.39        | 2.29                 | 0.009 | 0.473       | 0.034 0.                | 0.00000319     | 5 9.12214E-06 | 9.47143E-07 | 1.65207E-05 | 5.03             | 0.43              | 0.41 | 2.59       | 2.17             |
| Rubber Tire Gantry Crane    | 2008                    | 315                     | 3000                           | 0.21                     | 36111                                       | 6000                             | 7000                        | 3.03    | 0.36        | 0.38        | 2.17                 | 0.008 | 0.473       | 0.027 0.                | 1.73143E-0     | 5 1.21629E-05 | 7.32857E-07 | 0.000023405 | 3.04             | 0.43              | 0.38 | 2.31       | 2.17             |
| Side Loader                 | 2002                    | 320                     | 3000                           | 0.43                     | 36111                                       | 24000                            | 7000                        | 4.68    | 0.14        | 0.18        | 0.93                 | 0.009 | 0.473       | 0.034 0.                | 01 3.00857E-0  | 5 0.00000473  | 4.37143E-07 | 6.70929E-06 | 4.75             | 0.25              | 0.19 | 1.09       | 2.17             |
| Forklift                    | 2002                    | 155                     | 3000                           | 0.43                     | 10878                                       | 24000                            | 4667                        | 5.65    | 0.28        | 0.34        | 0.87                 | 0.024 | 0.473       | 0.036 0.                | 1.45275E-0     | 5 1.4189E-05  | 1.31133E-06 | 9.41397E-06 | 6.00             | 0.62              | 0.37 | 1.10       | 2.17             |
| Side Loader                 | 2008                    | 175                     | 3000                           | 0.43                     | 10878                                       | 6000                             | 4667                        | 2.82    |             |             | 0.87                 |       |             |                         | 151 2.41697E-0 |               |             |             | 2.83             |                   |      | 0.95       | 2.17             |
| Forklift                    | 2008                    | 175                     | 3000                           | 0.43                     | 10878                                       | 6000                             | 4667                        | 2.82    |             | 0.20        | 0.87                 | 0.008 | 0.473       |                         | 151 2.41697E-0 |               |             |             | 2.83             | 0.30              | 0.20 | 0.95       | 2.17             |
|                             |                         |                         |                                |                          |   |                                  |                             |         | 1 0.20      |             |                      |       |             |                         |                |               |             |             |                  | 1 0.00            |      |            |                  |
| Ariel Platform              | 1997                    | 80                      | 500                            | 0.46                     | 1236  | 6500                             | 3000                        | 8.43    | 0.06        | 5.01        | 155.50               | 0.024 | 0.473       | 0.047 0.                | 0.0000337      | 0.00000473    | 0.000039245 | 0.004794583 | 8.65             | 0.09              | 5.27 | 186.66     | 2.17             |
| Forklift                    | 1998                    | 85                      | 500                            | 0.59                     | 1236  | 6000                             | 4667                        | 5.30    | 0.58        | 0.54        | 3.62                 | 0.024 | 0.473       | 0.036 0.                | 1.36276E-0     | 5 2.93915E-05 | 2.08271E-06 | 3.91708E-05 | 5.38             | 0.76              | 0.55 | 3.86       | 2.17             |
| Forklift                    | 1998                    | 40                      | 300                            | 0.3                      | 285   | 3600                             | 4500                        | 8.43    | 0.06        | 5.01        | 155.50               | 0.024 | 0.473       | 0.047 0.                | 0.0000224      | 3.15333E-06   | 2.61633E-05 | 0.003196389 | 8.51             | 0.07              | 5.10 | 167.01     | 2.17             |

Notes:

<sup>a</sup> Obtained from the Development of Emission Estimates for Locomotives in the Kansas City Metropolitan Statistical Area (ENVIRON 2010). Appendix B, Table B-5

<sup>b</sup> Source: EPA-420-8-10-025. EPA rates are based on 1,000 hours of annual activity. Thus a fuel consumption ratio was created to be representative of the duration of activity at the Facility per equipment type

<sup>c</sup> Deterioration factor for tier 3 nonroad diesel engines. Source: Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling - Compression-Ignition (EPA-420-R-10-018, 2010).

<sup>d</sup> Deterioration Rate = (Deterioration Factor x Zero Hour Emission Rate) / Cumulative hours at the end of useful life

e EF = Zero Hour Emissions Rate + (Deterioration Rate x Cumulative Hours)

<sup>f</sup> SO2 (g/gal) = (fuel density) x (conversion factor) x (64 g SO2/32 g S) x (S content of Fuel)





## **Appendix B** Emission Calculation Tables



### BNSF Argentine Emissions Inventory (2008) On-site Emissions from Switching Locomotives

| # of switching locomotives              | 28  |
|---|-----|
| Switcher activity frequency (days/year) | 365 |
| Duration of activity (hrs/day)          | 12  |
| Fuel consumption (gal/hr)               | 14  |

| Switching L      | ocomotives (2     | 2008)                    |        |       |         |       |                    |                       |        |       |            |           |                    |               |            |          |        |       |                    |               |       |      |
|------------------|-------------------|--------------------------|--------|-------|---------|-------|--------------------|-----------------------|--------|-------|------------|-----------|--------------------|---------------|------------|----------|--------|-------|--------------------|---------------|-------|------|
|                  | Emiss             | ion Factors <sup>a</sup> | g/gal) |       |         |       | Emissions          | <sup>e</sup> (lb/day) |        |       |            |           | Annual Emis        | sions (lb/yr) |            |          |        |       | Annual Emiss       | ions (tons/yı | r)    |      |
| NOx <sup>b</sup> | PM10 <sup>b</sup> | нс⋼                      | ۲Ο ۵   | SO2 d | NOx     | PM10  | PM2.5 <sup>f</sup> | HC                    | со     | SO2   | NOx        | PM10      | PM2.5 <sup>f</sup> | HC            | со         | SO2      | NOx    | PM10  | PM2.5 <sup>f</sup> | HC            | со    | SO2  |
| 243              | 5.5               | 14.5                     | 27.82  | 2.17  | 2517.78 | 56.99 | 55.28              | 150.24                | 288.25 | 22.53 | 918,989.60 | 20,800.18 | 20,176.17          | 54,836.83     | 105,211.07 | 8,222.96 | 459.49 | 10.40 | 10.09              | 27.42         | 52.61 | 4.11 |

#### Notes:

<sup>a</sup> The emission factors reflects the penetration of the various tiers of locomotives in the fleet over time as referenced in EPA-420-F-09-025, April 2009.

<sup>b</sup> Source: Expected switcher fleet average emission factors in 2008 (EPA-420-F-09-025, April 2009)

<sup>c</sup> Source: EPA-420-R-98-101, April 1998. Note: Emission rates were originally in g/hp-hr. Pursuant to guidance 15.2 bhp-hr/gal for switchers

CO emission rates were not expected to change with emission controls

<sup>d</sup> SO2 (g/gal) = (fuel density) x (conversion factor) x (64 g SO2/32 g S) x (S content of Fuel)

e Emissions [lb/day] = (Emission Factor [g/gal]) x (Fuel Use [gal/hr]) x (Duration of Activity [hr/day]) x (Frequency [ # of in-service locomotives]) x (1/454 [lb/g])

<sup>f</sup> It was assumed that 97% of PM10 fugitive dust emissions are comprised of PM2.5. Source: Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories (EPA, April 2009)

### BNSF Argentine Emissions Inventory (2014)

### **On-site Emissions from Switching Locomotives**

 # of switching locomotives
 9

 Switcher activity frequency (days/year)
 365

 Duration of activity (hrs/day)
 11.25

 Fuel consumption (gal/hr)
 9

| 2 | witching Lo      | comotives (2      | 014)                      |        |                  |        |      |                    |                       |       |      |            |          |                    |               |           |       |       |      |                    |               |       |      |
|---|------------------|-------------------|---------------------------|--------|------------------|--------|------|--------------------|-----------------------|-------|------|------------|----------|--------------------|---------------|-----------|-------|-------|------|--------------------|---------------|-------|------|
|   |                  | Emissi            | on Factors <sup>a</sup> ( | g/gal) |                  |        |      | Emissions          | <sup>e</sup> (lb/day) |       |      |            |          | Annual Emis        | sions (lb/yr) |           |       |       |      | Annual Emiss       | ions (tons/yr | )     |      |
|   | NOx <sup>b</sup> | PM10 <sup>b</sup> | нс⋼                       | co ۲   | SO2 <sup>d</sup> | NOx    | PM10 | PM2.5 <sup>f</sup> | нс                    | со    | SO2  | NOx        | PM10     | PM2.5 <sup>f</sup> | нс            | со        | SO2   | NOx   | PM10 | PM2.5 <sup>f</sup> | нс            | со    | SO2  |
|   | 217              | 4.8               | 12.7                      | 27.82  | 0.09             | 435.55 | 9.63 | 9.35               | 25.49                 | 55.84 | 0.19 | 158,977.00 | 3,516.54 | 3,411.05           | 9,304.18      | 20,381.29 | 68.91 | 79.49 | 1.76 | 1.71               | 4.65          | 10.19 | 0.03 |

#### Notes:

<sup>a</sup> The emission factors reflects the penetration of the various tiers of locomotives in the fleet over time as referenced in EPA-420-F-09-025, April 2009.

<sup>b</sup> Source: Expected switcher fleet average emission factors in 2014 (EPA-420-F-09-025, April 2009)

<sup>c</sup> Source: EPA-420-R-98-101, April 1998. Note: Emission rates were originally in g/hp-hr. Pursuant to guidance 15.2 bhp-hr/gal for switchers

CO emission rates were not expected to change with emission controls

<sup>d</sup> SO2 (g/gal) = (fuel density) x (conversion factor) x (64 g SO2/32 g S) x (S content of Fuel)

<sup>e</sup> Emissions [lb/day] = (Emission Factor [g/gal]) x (Fuel Use [gal/hr]) x (Duration of Activity [hr/day]) x (Frequency [ # of in-service locomotives]) x (1/454 [lb/g])

<sup>f</sup> It was assumed that 97% of PM10 fugitive dust emissions are comprised of PM2.5. Source: Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories (EPA, April 2009)



#### BNSF Argentine Emissions Inventory (2008) Line-Hail Locomotives Idling Emissions

| # of idling line-haul locomotives (locomotives/day) | 112  |
|---|------|
| Line-haul frequency (days/year)                     | 365  |
| Idle time (hrs/locomotive)                          | 0.50 |
| Fuel usage while at idle (gal/hr)                   | 4    |

| Line-Ha | ul Loco    | omotives Idl      | ing (2008)                |        |       |       |      |                        |          |       |      |           |        |                    |            |          |        |       |      |                    |             |      |      |
|---------|------------|-------------------|---------------------------|--------|-------|-------|------|------------------------|----------|-------|------|-----------|--------|--------------------|------------|----------|--------|-------|------|--------------------|-------------|------|------|
|         |            | Emissi            | on Factors <sup>a</sup> ( | g/gal) |       |       |      | Emissions <sup>e</sup> | (lb/day) |       |      |           | An     | nual Emissio       | ns (lb/yr) |          |        |       | An   | nual Emission      | s (tons/yr) |      | -    |
| NOx     | , <b>b</b> | PM10 <sup>b</sup> | нс⁵                       | co ۲   | SO2 d | NOx   | PM10 | PM2.5 <sup>f</sup>     | нс       | со    | SO2  | NOx       | PM10   | PM2.5 <sup>f</sup> | нс         | со       | SO2    | NOx   | PM10 | PM2.5 <sup>f</sup> | нс          | со   | SO2  |
| 169     | 9          | 5.1               | 9                         | 26.6   | 2.17  | 83.12 | 2.51 | 2.43                   | 4.43     | 13.08 | 1.07 | 30,337.84 | 915.52 | 888.05             | 1,615.62   | 4,775.07 | 390.32 | 15.17 | 0.46 | 0.44               | 0.81        | 2.39 | 0.20 |

Notes:

<sup>a</sup> The emission factors reflects the penetration of the various tiers of locomotives in the fleet over time as referenced in EPA-420-F-09-025, April 2009. % Turnover of new locomotives ranged from 3-5% yearly

<sup>b</sup> Source: Expected line-haul fleet average emission factors in 2008 (EPA-420-F-09-025, April 2009)

<sup>c</sup> Source: EPA-420-R-98-101, April 1998. Note: Emission rates were originally in g/hp-hr. Pursuant to guidance 20.8 bhp-hr/gal for line-haul locomotives

CO emission rates were not expected to change with emission controls

<sup>d</sup> SO2 (g/gal) = (fuel density) x (conversion factor) x (64 g SO2/32 g S) x (S content of Fuel)

<sup>e</sup>Emissions Idling [lb/day] = (Emission Factor [g/gal]) x (Fuel Use [gal/hr]) x (Idling Time [hr/locomotive]) x (Frequency [locomotives/day]) x (1/454 [lb/g])

<sup>1</sup> It was assumed that 97% of PM10 fugitive dust emissions are comprised of PM2.5. Source: Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories (EPA, April 2009)

### BNSF Argentine Emissions Inventory (2014)

Line-Hail Locomotives Idling Emissions

| # of idling line-haul locomotives (locomotives/day) | 112  |
|---|------|
| Line-haul frequency (days/year)                     | 365  |
| Idle time (hrs/locomotive)                          | 0.38 |
| Fuel usage while at idle (gal/hr)                   | 4    |

| Line-I | Haul Loc        | omotives Idl      | ing (2014)                |         |       |       |      |                        |          |      |      |           |        |                    |            |          |       |      |      |                    |             |      |      |
|--------|-----------------|-------------------|---------------------------|---------|-------|-------|------|------------------------|----------|------|------|-----------|--------|--------------------|------------|----------|-------|------|------|--------------------|-------------|------|------|
|        |                 | Emissi            | on Factors <sup>a</sup> ( | (g/gal) |       |       |      | Emissions <sup>e</sup> | (lb/day) |      |      |           | An     | nual Emissio       | ns (Ib/yr) |          |       |      | An   | nual Emission      | s (tons/yr) |      |      |
| N      | Dx <sup>b</sup> | PM10 <sup>b</sup> | HC⁵                       | c٥ ʻ    | SO2 d | NOx   | PM10 | PM2.5 <sup>f</sup>     | нс       | со   | SO2  | NOx       | PM10   | PM2.5 <sup>f</sup> | нс         | со       | SO2   | NOx  | PM10 | PM2.5 <sup>f</sup> | нс          | со   | SO2  |
| 1      | .35             | 3.6               | 6.1                       | 26.6    | 0.09  | 49.80 | 1.33 | 1.29                   | 2.25     | 9.81 | 0.03 | 18,175.78 | 484.69 | 470.15             | 821.28     | 3,581.30 | 12.66 | 9.09 | 0.24 | 0.24               | 0.41        | 1.79 | 0.01 |

#### Notes:

<sup>a</sup> The emission factors reflects the penetration of the various tiers of locomotives in the fleet over time as referenced in EPA-420-F-09-025, April 2009. % Turnover of new locomotives ranged from 3-5% yearly

<sup>b</sup> Source: Expected line-haul fleet average emission factors in 2014 (EPA-420-F-09-025, April 2009)

<sup>c</sup> Source: EPA-420-R-98-101, April 1998. Note: Emission rates were originally in g/hp-hr. Pursuant to guidance 20.8 bhp-hr/gal for line-haul locomotives

CO emission rates were not expected to change with emission controls

<sup>d</sup> SO2 (g/gal) = (fuel density) x (conversion factor) x (64 g SO2/32 g S) x (S content of Fuel)

e Emissions Idling [lb/day] = (Emission Factor [g/gal]) x (Fuel Use [gal/hr]) x (Idling Time [hr/locomotive]) x (Frequency [locomotives/day]) x (1/454 [lb/g])

<sup>r</sup> It was assumed that 97% of PM10 fugitive dust emissions are comprised of PM2.5. Source: Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories (EPA, April 2009)



Test Type

### BNSF Argentine Emissions Inventory (2008) On-site Emissions from Maintenance

Number

| Test Type                                  | Number |              |               |              |            |             | Full Load Emissio | ons (2008)       |           |         |              |                |          |        |       |           |                  |               |               |
|--|--------|--------------|---------------|--------------|------------|-------------|-------------------|------------------|-----------|---------|--------------|----------------|----------|--------|-------|-----------|------------------|---------------|---------------|
| Engine Full Load - Argentine (tests/year)  | 1122   | 2            |               |              |            |             |                   |                  |           | Full    | Load Testing | Emissions (Ib) | (vear)   |        |       | Ful       | Load Testing Er  | nissions (tor | ns/vear)      |
| Opacity Test - Argentine LMIT (tests/year) | 391    |              |               |              |            |             | Engine Model      | Notch            | NOx       | PM10    | PM2.5*       | нс             | со       | SO2    | NOx   | PM10      | PM2.5            | нс            | со            |
| Opacity Test - Argentine GE (tests/year)   | 707    |              |               |              |            |             |                   | 8                | 136480.55 | 2939.50 | 2851.32      | 3645.88        | 14160.93 | 116.87 | 68.24 | 1.47      | 1.43             | 1.82          | 7.08          |
|  | 0.75   |              |               |              |            |             | Average           | 8                | 130460.33 | 2939.50 | 2001.02      | 3043.66        | 14100.95 | 110.87 | 06.24 | 1.47      | 1.45             | 1.62          | 7.08          |
| Full Load Test Duration (hrs/test)         | 0.75   |              |               |              |            |             |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Opacity Test Duration (hrs/test)           |        |              |               |              |            |             |                   | /2000            |           |         |              |                |          |        |       |           |                  |               |               |
| Fuel usage (gal/hr)                        | 29     | 9            |               |              |            |             | Opacity Testing   | Emissions (2008) |           |         |              |                |          |        |       |           |                  | <u> </u>      | ( <u> </u>    |
|  |        |              |               |              |            |             |                   |                  |           |         |              | Emissions (Ib/ |          |        |       |           | acity Testing En |               |               |
|  |        |              | Em            | ission Facto | ors        |             | Engine Model      | Notch            | NOx       | PM10    | PM2.5*       | HC             | co       | SO2    | NOx   | PM10      | PM2.5*           | HC            | со            |
| Engine Model                               | Notch  | NOx (g/hr)   | ) PM10 (g/hr) | HC (g/hr)    | CO (g/hr)  | SO2 (g/gal) | Average           | Idle             | 264.61    | 9.46    | 9.18         | 30.46          | 28.19    | 11.44  | 0.13  | 0.005     | 0.005            | 0.02          | 0.01          |
| Dash 9 (Tier 0)                            | Idle   | 928          | 33.8          | 109          | 95         | 2.17        | Average           | DB               | 600.03    | 29.35   | 28.47        | 86.53          | 126.07   | 11.44  | 0.30  | 0.015     | 0.014            | 0.04          | 0.06          |
| Dash 9 (Tier 0)                            | DB     | 1010         | 50.7          | 160          | 197        | 2.17        | Average           | 1                | 840.01    | 30.38   | 29.47        | 66.92          | 85.07    | 11.44  | 0.42  | 0.015     | 0.015            | 0.03          | 0.04          |
| Dash 9 (Tier 0)                            | 1      | 2511         | 56.1          | 141          | 139        | 2.17        | Average           | 2                | 1978.18   | 65.37   | 63.41        | 104.52         | 148.59   | 11.44  | 0.99  | 0.033     | 0.032            | 0.05          | 0.07          |
| Dash 9 (Tier 0)                            | 2      | 4806         | 117.4         | 227          | 310        | 2.17        | Average           | 3                | 5433.19   | 121.77  | 118.12       | 228.48         | 378.20   | 11.44  | 2.72  | 0.061     | 0.059            | 0.11          | 0.19          |
| Dash 9 (Tier 0)                            | 3      | 13851        | 205.7         | 584          | 831        | 2.17        | Average           | 4                | 6802.42   | 151.64  | 147.09       | 231.72         | 720.59   | 11.44  | 3.40  | 0.076     | 0.074            | 0.12          | 0.36          |
| Dash 9 (Tier 0)                            | 4      | 18663        | 243.9         | 492          | 2136       | 2.17        | Average           | 5                | 6016.53   | 217.28  | 210.76       | 295.88         | 821.22   | 11.44  | 3.01  | 0.109     | 0.105            | 0.15          | 0.41          |
| Dash 9 (Tier 0)                            | 5      | 13663        | 571.5         | 726          | 2801       | 2.17        | Average           | 6                | 8521.34   | 219.74  | 213.15       | 357.95         | 818.79   | 11.44  | 4.26  | 0.110     | 0.107            | 0.18          | 0.41          |
| Dash 9 (Tier 0)                            | 6      | 21113        | 514.6         | 870          | 2502       | 2.17        | Average           | 7                | 10043.22  | 220.63  | 214.01       | 399.43         | 1042.89  | 11.44  | 5.02  | 0.110     | 0.107            | 0.20          | 0.52          |
| Dash 9 (Tier 0)                            | 7      | 25089        | 496.9         | 999          | 2932       | 2.17        | Average           | 8                | 11931.47  | 256.98  | 249.27       | 318.73         | 1237.98  | 11.44  | 5.97  | 0.128     | 0.125            | 0.16          | 0.62          |
| Dash 9 (Tier 0)                            | 8      | 31154        | 460.3         | 1239         | 3250       | 2.17        | Be                | Total            | 52431.01  | 1322.60 | 1282.92      | 2120.61        | 5407.59  | 114.37 | 26.22 | 0.66      | 0.64             | 1.06          | 2.70          |
|  |        |              |               |              |            |             |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
|  |        |              | Em            | ission Facto | ors        |             |                   |                  |           |         |              |                |          |        |       | Full Loar | + Opacity Testi  | ng Emission   | s (tons/year) |
| Engine Model                               | Notch  | NOx (g/hr)   |               |              |            | SO2 (g/gal) |                   |                  |           |         |              |                |          |        | NOx   | PM10      | PM2.5*           | нс            | 0             |
| Dash 9 (Tier 1)                            | Idle   | 376          | 16.9          | 55           | 49         | 2.17        |                   |                  |           |         |              |                |          |        | 94.46 |           |                  |               |               |
|  | DB     | 2036         | 88.4          | 309          | 49         | 2.17        |                   |                  |           |         |              |                |          |        | 94.40 | 2.13      | 2.07             | 2.00          | 9.76          |
| Dash 9 (Tier 1)                            | 1      |              |               |              | 461<br>244 | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Dash 9 (Tier 1)<br>Dash 9 (Tier 1)         | 2      | 1538<br>4672 | 62.1<br>140.2 | 210<br>298   | 244<br>368 | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
|  | 2      |              |               | 298          | 306<br>896 |             |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Dash 9 (Tier 1)                            | 3      | 14369        | 272.8         |              |            | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Dash 9 (Tier 1)                            | 4      | 16071        | 354.5         | 714          | 1505       | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Dash 9 (Tier 1)                            |        | 13855        | 393.4         | 789          | 1788       | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Dash 9 (Tier 1)                            | 6      | 18020        | 466.4         | 931          | 2014       | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Dash 9 (Tier 1)                            | 7      | 20886        | 445.1         | 978          | 2714       | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Dash 9 (Tier 1)                            | 8      | 23913        | 632.1         | 109          | 3356       | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
|  |        |              | -             |              |            |             |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
|  |        |              |               | ission Facto |            |             |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Engine Model                               | Notch  | NOx (g/hr)   |               |              |            |             |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| ES44 (Tier 2)                              | Idle   | 329          | 7.7           | 24           | 30         | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| ES44 (Tier 2)                              | DB     | 657          | 42            | 65           | 120        | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| ES44 (Tier 2)                              | 1      | 1135         | 69.3          | 62           | 142        | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| ES44 (Tier 2)                              | 2      | 2730         | 145.8         | 120          | 239        | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| ES44 (Tier 2)                              | 3      | 5310         | 273           | 220          | 607        | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| ES44 (Tier 2)                              | 4      | 7246         | 337.4         | 224          | 806        | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| ES44 (Tier 2)                              | 5      | 9612         | 376           | 311          | 479        | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| ES44 (Tier 2)                              | 6      | 13455        | 375.1         | 408          | 537        | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| ES44 (Tier 2)                              | 7      | 16005        | 419.6         | 488          | 790        | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| ES44 (Tier 2)                              | 8      | 18566        | 493.5         | 619          | 1034       | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
|  |        |              |               |              |            |             |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
|  |        |              |               | ission Facto |            |             |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Engine Model                               | Notch  | NOx (g/hr)   |               |              |            | SO2 (g/gal) |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Average                                    | Idle   | 1633         | 58.4          | 188          | 174        | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Average                                    | DB     | 3703         | 181.1         | 534          | 778        | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Average                                    | 1      | 5184         | 187.5         | 413          | 525        | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Average                                    | 2      | 12208        | 403.4         | 645          | 917        | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Average                                    | 3      | 33530        | 751.5         | 1410         | 2334       | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Average                                    | 4      | 41980        | 935.8         | 1430         | 4447       | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Average                                    | 5      | 37130        | 1340.9        | 1826         | 5068       | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Average                                    | 6      | 52588        | 1356.1        | 2209         | 5053       | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Average                                    | 7      | 61980        | 1361.6        | 2465         | 6436       | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
| Average                                    | 8      | 73633        | 1585.9        | 1967         | 7640       | 2.17        |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |
|  |        |              |               |              |            |             |                   |                  |           |         |              |                |          |        |       |           |                  |               |               |

arce Port-Related Emission Inventories (EPA, April 2009)

Full Load E

Source: Port of Oakland 2005 Air Emissions Inventory (ENVIRON 2008) <sup>1</sup> It was assumed that 97% of PM10 fugible dust emissions are comprised of PM2.5. Source: Current Metho Emissions = (Notch Specific EF) x (Time in Notch [kri]) x (# of maintenance locomotive tests) x (1/454 [lb/g])

### BNSF Argentine Emissions Inventory (2014) On-site Emissions from Maintenance

|   | ns (tons/year)<br>HC CO SO3<br>1.19 3.66 0.01 |
|---|---|
| Engine Full Load - Argentine (tests/year)         6420         Engine Model         Noch         NOx         PM10         PM2.5*         HC         CO         SO2         NOx         PM10         PM2.5*         III           OpactVF test - Argentine (tests/year)         189         Average         8         131270.62         3489.28         3384.61         4376.63         7310.88         19.29         65.64         1.74         1.69         2           Pull Load Test Variantine (hrs/strest)         0.50 | HC CO SO                                      |
| Opacity Test - Argentine [tests/year]         1189           Average         8         131270.62         3489.28         3384.61         4376.63         7310.88         19.29         65.64         1.74         1.69         2           Full Load Test Duration (hrs/test)         0.50  |   |
| Fuil Load Test Duration (hrs/test) 0.50   | .19 3.66 0.01                                 |
|   |   |
| Opacity Test Duration (hrs/test) 0.50   |   |
|   |   |
| Fuel usage (gal/hr) 29 Opacity Testing Emissions (2014)   |   |
| Opacity Testing Emissions (Ib/year) Opacity Testing Emission  | is (tons/year)                                |
| Emission Factors Engine Model Notch NOX PM10 PM2.5* HC CO SO2 NOX PM10 PM2.5*   | HC CO SO2                                     |
| Engine Model Notrk NOx (g/hr) PM10 (g/hr) HC (g/hr) CO (g/hr) SO2 (g/gal) Average Idle 43.08 1.01 0.98 3.14 3.93 0.36 0.022 0.001 0.0005 0.   | 002 0.002 0.000                               |
| ES44 (Tier 2) Idle 329 7.7 24 30 0.09 Average DB 86.03 5.50 5.33 8.51 15.71 0.36 0.043 0.003 0.0027 0.  | .004 0.008 0.000                              |
| ES44 (Tier 2) D8 657 42 65 120 0.09 Average 1 148.63 9.07 8.80 8.12 18.59 0.36 0.074 0.005 0.0044 0.  | .004 0.009 0.000                              |
| ES44 (Tier 2) 1 1135 69.3 62 142 0.09 Average 2 357.49 19.09 18.52 15.71 31.30 0.36 0.179 0.010 0.0093 0.   | .008 0.016 0.000                              |
| ES44 (Tier 2) 2 2730 145.8 120 239 0.09 Average 3 695.33 35.75 34.68 28.81 79.48 0.36 0.348 0.018 0.0173 0.   | .014 0.040 0.000                              |
| ES44 (Tier 2) 3 5310 273 220 607 0.09 Average 4 948.84 44.18 42.86 29.33 105.54 0.36 0.474 0.022 0.0214 0.  | .015 0.053 0.000                              |
|   | .020 0.031 0.000                              |
| E544 (Tier 2) 5 9612 376 311 479 0.09 Average 6 1761.89 49.12 47.64 53.43 70.32 0.36 0.881 0.025 0.0238 0.  | .027 0.035 0.000                              |
|   | .032 0.052 0.000                              |
|   | .041 0.068 0.000                              |
| E544 (Tier 2) 8 18566 493.5 619 1034 0.09 Total 9826.93 332.53 322.55 332.74 626.45 3.57 4.91 0.17 0.16 0   | 0.17 0.31 0.003                               |
| Source: Port of Quilland 2005 Air Emissions Inventory (EW/BOX 2008)   | issions (tons/vear)                           |
|   | HC CO SO2                                     |
| n wa assume tuta 5 yo 1 mili tugare tuta e matemate locate and the statistica e content wettado (1944) (b)(1)   | 2.35 3.97 (                                   |
| Europana – fuerra abecure esta el rune na norma (nil) x (e on mantenance normative enconactive encos) x (14-26 [008])   | 2.33 3.97 0                                   |



SO2 0.06

SO2

0.01

CO SO2 9.78 0.12

### BNSF Argentine Emissions Inventory (2008) Truck Activity Emissions

| Fuel Economy (mpg)                         | 6.3     |
|--|---------|
| # of truck trips/year                      | 605,051 |
| Entrance Trip Length (mi/truck trip)       | 0.10    |
| Entrance Queue Idling (hrs)                | 0.05    |
| Argentine Yard Trip Length (mi/truck trip) | 2.00    |
| Argentine Yard Idling (hrs)                | 0.11    |
| Exit Trip Length (mi/truck trip)           | 0.10    |
| Exit Queue Idling (hrs)                    | 0.01    |

#### In-Use Truck Activity (2008) **Emission Factors** Annual Emissions (lb/yr) Annual Emissions (tons/yr) PM2.5 <sup>c,d</sup> NOx PM10 PM2.5<sup>d</sup> нс со SO2 NOx (g/mile) <sup>a</sup> PM10 (g/mile) <sup>a</sup> HC (g/mile) <sup>a</sup> CO (g/mile) <sup>a</sup> SO2 (g/gal) <sup>b</sup> NOx <sup>c</sup> PM10 ° нсʿ c٥ ° SO2 e 23,455.74 642.10 622.84 1.328.18 6.775.78 1.011.91 11.73 0.32 3.39 0.51 0.219 0.453 2.311 2.17 0.31 0.66 8

#### Notes:

<sup>a</sup> Average In-use Emission from Heavy-Duty Trucks (EPA420-F-08-027, October 2008)

<sup>b</sup> SO2 (g/gal) = (fuel density) x (conversion factor) x (64 g SO2/32 g S) x (S content of Fuel)

<sup>c</sup> Emissions [Ib/yr] = (Emission Factor [g/mile]) x (Trip Length [miles/truck trip]) x (Frequency [truck trips/yr]) x (1/454 [lb/g])

<sup>d</sup> It was assumed that 97% of PM10 fugitive dust emissions are comprised of PM2.5. Source: Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories (EPA, April 2009)

<sup>e</sup> SO2 Emissions [lb/yr] = (Emission Factor [g/gal]) x (1/Fuel Economy [mpg]) x (Distance [mi/trip]) x (Frequency [trips/year]) x (1/454 [lb/g])

| Truck Idling (2008)       |                            |                          |                          |                          |                  |                          |                      |        |          |                  |                            |      |                    |      |      |     |
|---------------------------|----------------------------|--------------------------|--------------------------|--------------------------|------------------|--------------------------|----------------------|--------|----------|------------------|----------------------------|------|--------------------|------|------|-----|
| Emission Factors          |                            |                          |                          |                          |                  | Annual Emissions (lb/yr) |                      |        |          |                  | Annual Emissions (tons/yr) |      |                    |      |      |     |
| NOx (g/mile) <sup>a</sup> | PM10 (g/mile) <sup>a</sup> | HC (g/mile) <sup>a</sup> | CO (g/mile) <sup>a</sup> | SO2 (g/gal) <sup>b</sup> | NOx <sup>c</sup> | PM10 <sup>c</sup>        | PM2.5 <sup>c,d</sup> | HC     | c٥ °     | SO2 <sup>e</sup> | NOx                        | PM10 | PM2.5 <sup>d</sup> | нс   | со   | SO2 |
| 33.763                    | 1.196                      | 3.503                    | 25.628                   | 2.17                     | 7,649.38         | 270.97                   | 262.84               | 793.64 | 5,806.31 |                  | 3.82                       | 0.14 | 0.13               | 0.40 | 2.90 |     |

#### Notes:

<sup>a</sup> Idling Vehicle Emissions for Passenger Cars, Light-Duty Trucks, and Heavy-Duty Trucks (EPA420-F-08-025, October 2008)

<sup>b</sup> SO2 (g/gal) = (fuel density) x (conversion factor) x (64 g SO2/32 g S) x (S content of Fuel)

<sup>c</sup> Emissions [lb/yr] = (Emission Factor [g/hr]) x (Idling time [hr/truck trip]) x (Frequency [truck trips/yr]) x (1/454 [lb/g])

<sup>d</sup> It was assumed that 97% of PM10 fugitive dust emissions are comprised of PM2.5. Source: Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories (EPA, April 2009)

<sup>e</sup> SO2 Emissions are nominal



### BNSF Argentine Emissions Inventory (2008) CHE Emissions

| Equipment                  | Counts | Horsepower | Load Factor | Activity (hrs/year) | Fuel Consumption<br>(gal/year) |
|----------------------------|--------|------------|-------------|---------------------|--------------------------------|
| Hostler (2005)             | 5      | 152        | 0.59        | 3180                | 11531                          |
| Hostler (2006)             | 9      | 152        | 0.59        | 3180                | 11531                          |
| Hostler (2007)             | 3      | 152        | 0.59        | 3180                | 11531                          |
| Hostler (2008)             | 6      | 152        | 0.59        | 3180                | 11531                          |
| Hostler (2009)             | 10     | 152        | 0.59        | 3180                | 11531                          |
| Mobile Repair Van (2004)   | 1      | 225        | 0.30        | 1500                | 9924                           |
| Mobile Repair Van (1998)   | 6      | 225        | 0.30        | 1500                | 9924                           |
| Rubber Gantry Crane (1998) | 1      | 220        | 0.21        | 3000                | 19848                          |
| Rubber Gantry Crane (1991) | 1      | 220        | 0.21        | 3000                | 19848                          |
| Rubber Gantry Crane (1993) | 1      | 220        | 0.21        | 3000                | 19848                          |
| Rubber Gantry Crane (2000) | 1      | 315        | 0.21        | 3000                | 36111                          |
| Rubber Gantry Crane (2004) | 1      | 315        | 0.21        | 3000                | 36111                          |
| Rubber Gantry Crane (2008) | 1      | 315        | 0.21        | 3000                | 36111                          |
| Side Loader (2002)         | 1      | 320        | 0.43        | 3000                | 36111                          |
| Forklift (2002)            | 1      | 155        | 0.43        | 3000                | 10878                          |
| Side Loader (2008)         | 1      | 175        | 0.43        | 3000                | 10878                          |
| Forklift (2008)            | 1      | 155        | 0.43        | 3000                | 10878                          |
| Ariel Platform (1997)      | 1      | 80         | 0.46        | 500                 | 1236                           |
| Forklift (1998)            | 1      | 85         | 0.59        | 500                 | 1236                           |
| Forklift (1998)            | 1      | 40         | 0.59        | 300                 | 285                            |

| Cargo Handling Equipment (200 | 08)                        |                  |                           |                           |                          |                  |           |                      |           |                            |          |       |      |                    |      |        |      |
|-------------------------------|----------------------------|------------------|---------------------------|---------------------------|--------------------------|------------------|-----------|----------------------|-----------|----------------------------|----------|-------|------|--------------------|------|--------|------|
|                               | Emission Factors           |                  |                           |                           | Annual Emissions (lb/yr) |                  |           |                      |           | Annual Emissions (tons/yr) |          |       |      |                    |      |        |      |
| Equipment                     | NOx (g/hp-hr) <sup>a</sup> | PM10 (g/hp-hr) ° | HC (g/hp-hr) <sup>a</sup> | CO (g/hp-hr) <sup>a</sup> | SO2 (g/gal) <sup>b</sup> | Nox <sup>c</sup> | PM10 °    | PM2.5 <sup>c,d</sup> | HCʻ       | coʻ                        | SO2 °    | NOx   | PM10 | PM2.5 <sup>d</sup> | нс   | со     | SO2  |
| Hostler (2005)                | 4.09                       | 0.42             | 0.37                      | 1.56                      | 2.17                     | 12,851.37        | 1,304.42  | 1,265.29             | 1,162.94  | 4,895.92                   | 276.12   | 6.43  | 0.65 | 0.633              | 0.58 | 2.45   | 0.14 |
| Hostler (2006)                | 4.08                       | 0.38             | 0.37                      | 1.51                      | 2.17                     | 23,062.62        | 2,138.42  | 2,074.27             | 2,070.37  | 8,553.92                   | 497.01   | 11.53 | 1.07 | 1.037              | 1.04 | 4.28   | 0.25 |
| Hostler (2007)                | 2.91                       | 0.34             | 0.22                      | 1.54                      | 2.17                     | 5,490.63         | 642.96    | 623.67               | 406.66    | 2,893.15                   | 165.67   | 2.75  | 0.32 | 0.312              | 0.20 | 1.45   | 0.08 |
| Hostler (2008)                | 2.91                       | 0.30             | 0.21                      | 1.47                      | 2.17                     | 10,951.58        | 1,146.23  | 1,111.85             | 806.04    | 5,528.42                   | 331.34   | 5.48  | 0.57 | 0.556              | 0.40 | 2.76   | 0.17 |
| Hostler (2009)                | 2.62                       | 0.37             | 0.19                      | 1.40                      | 2.17                     | 16,439.53        | 2,334.02  | 2,264.00             | 1,204.47  | 8,784.25                   | 552.23   | 8.22  | 1.17 | 1.132              | 0.60 | 4.39   | 0.28 |
| Mobile Repair Van (2004)      | 2.13                       | 0.09             | 1.03                      | 55.89                     | 2.17                     | 474.80           | 19.71     | 19.12                | 230.60    | 12,463.73                  | 47.53    | 0.24  | 0.01 | 0.010              | 0.12 | 6.23   | 0.02 |
| Mobile Repair Van (1998)      | 8.83                       | 0.12             | 5.37                      | 186.91                    | 2.17                     | 11,821.68        | 156.24    | 151.55               | 7,186.59  | 250,106.68                 | 285.17   | 5.91  | 0.08 | 0.076              | 3.59 | 125.05 | 0.14 |
| Rubber Gantry Crane (1998)    | 6.72                       | 1.41             | 0.81                      | 2.67                      | 2.17                     | 2,051.30         | 431.11    | 418.18               | 246.85    | 814.48                     | 95.06    | 1.03  | 0.22 | 0.209              | 0.12 | 0.41   | 0.05 |
| Rubber Gantry Crane (1991)    | 10.61                      | 3.07             | 2.01                      | 14.78                     | 2.17                     | 3,237.77         | 937.81    | 909.67               | 612.94    | 4,512.25                   | 95.06    | 1.62  | 0.47 | 0.455              | 0.31 | 2.26   | 0.05 |
| Rubber Gantry Crane (1993)    | 10.46                      | 2.83             | 1.96                      | 13.96                     | 2.17                     | 3,194.21         | 864.48    | 838.54               | 598.55    | 4,260.30                   | 95.06    | 1.60  | 0.43 | 0.419              | 0.30 | 2.13   | 0.05 |
| Rubber Gantry Crane (2000)    | 6.98                       | 0.81             | 0.50                      | 4.09                      | 2.17                     | 3,051.71         | 352.06    | 341.50               | 216.58    | 1,786.57                   | 172.94   | 1.53  | 0.18 | 0.171              | 0.11 | 0.89   | 0.09 |
| Rubber Gantry Crane (2004)    | 5.03                       | 0.43             | 0.41                      | 2.59                      | 2.17                     | 2,197.60         | 189.79    | 184.10               | 177.93    | 1,130.98                   | 172.94   | 1.10  | 0.09 | 0.092              | 0.09 | 0.57   | 0.09 |
| Rubber Gantry Crane (2008)    | 3.04                       | 0.43             | 0.38                      | 2.31                      | 2.17                     | 1,329.00         | 189.26    | 183.58               | 168.03    | 1,009.92                   | 172.94   | 0.66  | 0.09 | 0.092              | 0.08 | 0.50   | 0.09 |
| Side Loader (2002)            | 4.75                       | 0.25             | 0.19                      | 1.09                      | 2.17                     | 4,320.95         | 230.51    | 223.60               | 173.20    | 992.01                     | 172.94   | 2.16  | 0.12 | 0.112              | 0.09 | 0.50   | 0.09 |
| Forklift (2002)               | 6.00                       | 0.62             | 0.37                      | 1.10                      | 2.17                     | 2,641.92         | 273.30    | 265.10               | 163.60    | 482.67                     | 52.10    | 1.32  | 0.14 | 0.133              | 0.08 | 0.24   | 0.03 |
| Side Loader (2008)            | 2.83                       | 0.30             | 0.20                      | 0.95                      | 2.17                     | 1,409.45         | 149.14    | 144.67               | 101.18    | 474.60                     | 52.10    | 0.70  | 0.07 | 0.072              | 0.05 | 0.24   | 0.03 |
| Forklift (2008)               | 2.83                       | 0.30             | 0.20                      | 0.95                      | 2.17                     | 1,248.37         | 132.10    | 128.13               | 89.61     | 420.36                     | 52.10    | 0.62  | 0.07 | 0.064              | 0.04 | 0.21   | 0.03 |
| Ariel Platform (1997)         | 8.65                       | 0.09             | 5.27                      | 186.66                    | 2.17                     | 350.54           | 3.68      | 3.57                 | 213.39    | 7,565.27                   | 5.92     | 0.18  | 0.00 | 0.002              | 0.11 | 3.78   | 0.00 |
| Forklift (1998)               | 5.38                       | 0.76             | 0.55                      | 3.86                      | 2.17                     | 297.24           | 41.77     | 40.52                | 30.52     | 212.92                     | 5.92     | 0.15  | 0.02 | 0.020              | 0.02 | 0.11   | 0.00 |
| Forklift (1998)               | 8.51                       | 0.07             | 5.10                      | 167.01                    | 2.17                     | 132.73           | 1.11      | 1.08                 | 79.60     | 2,604.43                   | 1.36     | 0.07  | 0.00 | 0.001              | 0.04 | 1.30   | 0.00 |
|                               |                            |                  |                           | Total                     |                          | 106,555.00       | 11,538.13 | 11,191.98            | 15,939.63 | 319,492.83                 | 3,301.51 | 53.28 | 5.77 | 5.60               | 7.97 | 159.75 | 1.65 |

Notes:

<sup>a</sup> EF = Zero Hour Emissions Rate + (Deterioration Rate x Cumulative Hours) See CHE Input Tab

<sup>b</sup> SO2 (g/gal) = (fuel density) x (conversion factor) x (64 g SO2/32 g S) x (S content of Fuel)

<sup>c</sup> Emissions[lb/year] = (Emission Factor [g/hp-hr]) x (Equipment Count) x (Horsepower) x (Load Factor) x (Operational Activity [hr/year]) x (1/454 [lb/g])

<sup>d</sup> It was assumed that 97% of PM10 fugitive dust emissions are comprised of PM2.5. Source: Current Methodologies in Preparing Mobile Source Port-Related Emission Inventories (EPA, April 2009)

<sup>e</sup> SO2 Emissions [lb/yr] = (Emission Factor [g/gal]) x (Fuel Consumption [gal/yr]) x (Equipment Count) x (1/454 [lb/g])



### BNSF Argentine Emissions Inventory (2008) Summary (Total Emissions)

| Emissions (2008)                  |        | Annual Emissions (tons/yr) |       |       |        |      |  |  |  |  |  |
|-----------------------------------|--------|----------------------------|-------|-------|--------|------|--|--|--|--|--|
| On-Site Activity                  | NOx    | PM10                       | PM2.5 | HC    | CO     | SO2  |  |  |  |  |  |
| Switching Locomotives             | 459.49 | 10.40                      | 10.09 | 27.42 | 52.61  | 4.11 |  |  |  |  |  |
| Line Haul Locomotives Idling      | 15.17  | 0.46                       | 0.44  | 0.81  | 2.39   | 0.20 |  |  |  |  |  |
| Maintenance Activity              | 94.46  | 2.13                       | 2.07  | 2.88  | 9.78   | 0.12 |  |  |  |  |  |
| Truck Activity                    | 15.55  | 0.46                       | 0.44  | 1.06  | 6.29   | 0.51 |  |  |  |  |  |
| Cargo Handling Equipment Activity | 53.28  | 5.77                       | 5.60  | 7.97  | 159.75 | 1.65 |  |  |  |  |  |
| Total                             | 637.95 | 19.21                      | 18.64 | 40.14 | 230.81 | 6.58 |  |  |  |  |  |

### BNSF Argentine Emissions Inventory (2014) Summary (Total Emissions)

|                                   |        | Annual Emissions (tons/yr) |       |      |       |      |  |  |  |
|-----------------------------------|--------|----------------------------|-------|------|-------|------|--|--|--|
| On-Site Activity                  | NOx    | PM10                       | PM2.5 | HC   | СО    | SO2  |  |  |  |
| Switching Locomotives             | 79.49  | 1.76                       | 1.71  | 4.65 | 10.19 | 0.03 |  |  |  |
| Line Haul Locomotives Idling      | 9.09   | 0.24                       | 0.24  | 0.41 | 1.79  | 0.01 |  |  |  |
| Maintenance Activity              | 70.55  | 1.91                       | 1.85  | 2.35 | 3.97  | 0.01 |  |  |  |
| Truck Activity                    |        |                            |       |      |       |      |  |  |  |
| Cargo Handling Equipment Activity |        |                            |       |      |       |      |  |  |  |
| Total                             | 159.13 | 3.91                       | 3.79  | 7.42 | 15.95 | 0.05 |  |  |  |

### BNSF Argentine Emissions Inventory Percent Reduction in 2014 vs 2008

| Emission Reductions (2014 vs 2008) |     |                               |       |     |     |     |  |  |  |  |
|------------------------------------|-----|-------------------------------|-------|-----|-----|-----|--|--|--|--|
|                                    |     | Emission Reduction Percentage |       |     |     |     |  |  |  |  |
| On-Site Activity                   | NOx | PM10                          | PM2.5 | HC  | CO  | SO2 |  |  |  |  |
| Switching Locomotives              | 83% | 83%                           | 83%   | 83% | 81% | 99% |  |  |  |  |
| Line Haul Locomotives Idling       | 40% | 47%                           | 47%   | 49% | 25% | 97% |  |  |  |  |
| Maintenance Activity               | 25% | 10%                           | 10%   | 18% | 59% | 90% |  |  |  |  |
| Truck Activity                     |     |                               |       |     |     |     |  |  |  |  |
| Cargo Handling Equipment Activity  |     |                               |       |     |     |     |  |  |  |  |
| Overall Reduction                  | 75% | 80%                           | 80%   | 82% | 93% | 99% |  |  |  |  |

