

The original documents are located in Box 4, folder “Auto Emissions (5)” of the James M. Cannon Files at the Gerald R. Ford Presidential Library.

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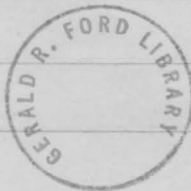
Quakes

Auto Emission

6/23/75

- 1) support Min's standards
- 2) adopt Ford standards
- 3) do nothing *
- 4) suggest Congress act
nothing during

2.



THE WHITE HOUSE
WASHINGTON

Sully Hall
DECISION
Bull

June 24, 1975

MEMORANDUM FOR: THE PRESIDENT
FROM: JIM CANNON *Juc*
SUBJECT: AUTO EMISSIONS

BACKGROUND

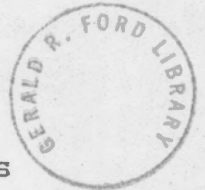
Just prior to your departure for Europe, you decided to:

1. Send to Congress, upon their return from the Memorial Day recess, a detailed statement of the environmental, energy, health and cost trade-offs concerning automobile emissions, but hold off making a specific recommendation for legislation until after committee hearings have been completed.
2. On the substance of the issue, you indicated a preference for a five-year extension of the current emission standards.

The committee work is now drawing to a close. The detailed statement pointing out the choices has not been transmitted, because both subcommittees involved (Muskie and Rogers) are proceeding to mark up without calling additional witnesses. These bills are now moving quickly.

Both committees appear headed towards recommending much tighter emission standards. We understand that the Rogers Subcommittee has not decided where to come out, but the Muskie Subcommittee, according to our information, is likely to recommend adherence with the 1978 statutory standards.

If final Congressional action is anywhere near this position, it will seriously jeopardize your energy goal of a 40% improvement in auto efficiency by 1980. Furthermore, such a decision raises substantial health questions concerning the emission of sulfuric acid mist.



Our best chance to focus attention on the energy-pollution-health-cost trade-offs will be when the House bill is considered by the full Commerce Committee and when the Senate bill goes to the floor.

ISSUES FOR DECISION

The purpose of this memorandum is to present two issues for your decision.

- A. Should you now transmit to Congress a specific recommendation on the auto emissions issue?
- B. If so, what form should it take?

DISCUSSION

- 1. Should you transmit a specific recommendation to the Congress on auto emissions to continue the present standards for five years?

Arguments in Favor

Neither the Senate nor the House subcommittees are expected to call additional witnesses on the impact of strict emission standards on fuel efficiency although they both have a letter on this from FEA. Both committees appear headed towards recommending tighter emission standards.

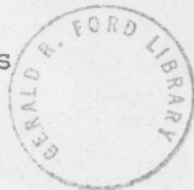
Submission at this time of a statement of facts only, without a recommendation, probably would not be viable because it would raise more questions than it would answer. If the committees are not going to hold additional hearings, in which they consider the energy impact of their emissions decision, there would be no forum to debate your statement of facts. Furthermore, Administration

spokesmen could expect to be barraged with questions as to where you come out on the issue, and we could not make the response that you wanted to wait until additional evidence was heard by Congress. As a practical matter, a statement by you, along with a specific recommendation, is probably necessary if we are to have any influence on the final outcome.

Arguments Against

EPA's John Quarles (Russ Train is out of the country), argues that if you take a position, your recommendation should be an endorsement of the Train announcement of March 5, which would impose a set of standards which are stricter than the existing levels, but less strict than your "modified California" proposal in January. They argue that Congress is more likely to respond to the Administration recommendation if you and Train are together. However, Frank Zarb, Jim Lynn and others feel that the Train position will prevent us from achieving our energy objectives.

Another point to consider is how you are perceived by environmentalists. The Hathaway nomination and the strip mine veto have resulted in criticism of your policies. Your decision on the auto emissions question will be controversial--perhaps eclipsing the strip mine veto. Therefore, you may wish to separate yourself from this decision as much as possible by just issuing a generalized statement of facts and leaving specific recommendations up to other Administration officials.



In essence, this would mean stating the facts, but no conclusions. Such a statement should stress: (1) achieving ambient air quality standards does not require strict auto standards; (2) sulfuric acid mist problems, and (3) the fuel efficiency trade-off.

2. If you decide to make a specific recommendation to the Congress, what form should it take?

This issue is: ;

Should you issue a statement personally, or should this be done by a subordinate?

Arguments That You Should Issue the Statement

This subject is of enormous importance to all Americans, as it touches their lives directly on a familiar issue. It involves the trade-off between conflicting national objectives, none of which fall under the sole responsibility of a subordinate official within your Administration. In short, this is exactly the type of inter-related decision involving many trade-offs which should be made by the President.

Arguments Against a Presidential Recommendation

This is going to be a controversial decision, regardless of which way you come down. This matter involves technical data and conclusions, much of which is in controversy, and much of the subject matter is simply unknown. Therefore, any Statement of Facts and conclusions are bound to be attacked as to their accuracy.

OPTIONS

1. Release Statement of Facts and make specific recommendation to the Congress freezing the current standards for five years.

Recommend: Seidman, FEA (Zausner), DOT (Barnum),
Cannon

Approve _____ Disapprove _____

Release statement of facts without recommendation.

Recommend: EPA (Quarles)

Approve _____ Disapprove _____

2. If it is decided to make a specific recommendation at this time: package it as a Presidential message or statement (draft message at Tab A).

Recommend: Seidman, FEA (Zausner), DOT (Barnum),
Cannon

Approve _____ Disapprove _____



Transmit from the appropriate Cabinet official.

Recommend:

Approve _____

Disapprove _____

Four and a half months ago, I sent to Congress my proposed Energy Independence Act of 1975. As a part of that comprehensive legislative proposal, I recommended that the Congress modify the Clean Air Act of 1970, concerning emissions from automobiles. I proposed strict pollution levels which would still permit this Nation to achieve one of my energy goals, which is a 40% improvement in automobile fuel efficiency within four years.

Since that time, information has been provided to me concerning potential health hazards from certain automobile pollution control devices first used on 1975 cars. In response to the serious issues raised by even the possibility of any such hazards, I ordered a review of the questions raised within the Executive Branch. I asked the appropriate Executive Branch officials to consider the various impacts of a range of emission alternatives on public health, energy goals, consumer prices and environmental objectives.

This review has now been completed. We have surveyed this entire subject matter, with many scientists and other experts, and find little agreement on the data or conclusions. There is, however, general agreement that we really cannot yet predict with precision which adverse impacts are likely to result if we now move to stricter automobile pollution standards. Most of the experts also agree that tighter

emission controls will limit the fuel economy potential of our cars, and all agree that they will increase costs to the consumer.

It is relatively easy to state the problem.

As the automobile manufacturers have responded to Federal requirements to remove pollutants from the car's exhaust, other unregulated pollutants with potentially serious health implications have been produced. The same devices which would help to control some emissions may result in the creation or aggravation of other emissions/pollutants. The result of government-mandated changes to our automobiles could then be further increases in their price tag, without substantial environmental benefits and with possible new risk to the Nation's health.

As a result of actions already taken, the automobile is rapidly becoming less of a contributor to air pollution. A major part of our task is behind us, but it was also the easiest part. We have now reached the point where the further incremental progress we all want can only be achieved slowly, and at higher cost. The relatively short distance remaining is a very rough road indeed.

I therefore urge Congress to consider how Federal laws mandating automobile fuel efficiency and emission control might work against each other, and how, cumulatively, they will impact on other national objectives such as public health and maintaining a strong economy.



In view of all of these considerations, I have decided that the position my Administration has already taken in the Energy Independence Act must be revised. We simply cannot afford to be wrong, or hesitant, where such serious issues are at stake. I have concluded that we should maintain the current automobile emission standards for five years. This will enable us to achieve the following objectives:

- ° Safety. Avoid increasing the potential adverse health impacts of certain automobile emission devices by retaining current controls on known health hazards, such as carbon monoxide and hydrocarbons, without the risk of increasing other imperfectly understood but potentially dangerous pollutants such as sulfuric acid.
- ° Energy. Achieve a 40%, or greater, increase in automobile fuel efficiency by 1980.
- ° Environment. Achieve almost all the environmental objectives we would have achieved by going to stricter standards.
- ° Cost. Minimize the inflationary impact of Federal regulations on the cost of automobiles to consumers.
- ° Economy. Assist needed revival of U.S. automobile industry.

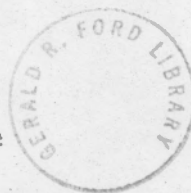
I recognize that this position modifies the auto emission standards contained in my proposed Energy Independence Act of 1975 which I transmitted to Congress on January 30. However, as pointed out in recent testimony during Congressional hearings, the Administrator of the Environmental Protection Agency has

already noted that it is necessary to adjust the strict emission standards that I proposed. Administrator Train concluded after hearings conducted by EPA that sulfuric acid mist is emitted from cars equipped with catalytic converters, which most new cars have in order to meet the EPA emission standards. The Administrator and the Secretary of Health, Education and Welfare, concluded that this is a potentially serious health hazard.

Evidence brought out at the EPA hearings and by other government reports, shows that levels of emissions from current catalytic converters do not emit sufficient sulfuric acid so as to constitute any immediate danger. However, if the auto emission standards are further lowered, as would be required if no change is made in the current law, then a modified catalytic converter is likely to be used. This could produce substantially more sulfuric acid. This poses a health risk which my advisers conclude we should not accept.

The Nation needs a long-term automobile fuel and emission control policy so that we can begin to build cars which will meet responsible energy and environmental standards. By getting on with the job of replacing the current fleet with the more fuel efficiency and less polluting new cars, we will be making substantial progress towards our goals of better fuel efficiency, less pollution and economic recovery.

Nothing could be more intolerable than delay in resolving the conflict between Federal energy and environmental policies



and laws. Such delays will only contribute to further economic disruption and the continuing unacceptable levels of unemployment. Lack of a comprehensive and balanced policy would allow one objective to go forward only at the expense of other critical national goals.

It may very well be that additional government standards, such as regulating the sulfuric acid emissions, will be required in future years. This is something which EPA and other government agencies will work on closely with the appropriate committees of Congress.

However, it is clear that we cannot duck our responsibility to make decisions now that establish realistic ground rules. We cannot afford to ignore the sulfuric acid problem, but our response must be more than simply another government decree, setting another standard, that could create another problem. We have a positive obligation to ensure that the steps we take today do not aggravate potentially serious health hazards.

Other technical information was brought to my attention as I reached my automobile emissions decision. In addition to a statement of facts, which I am making public today, I have asked my key advisers in this area to consult with the appropriate members of Congress, particularly the committees now considering legislation in this field. They will be available to discuss these complex and interrelated issues and to provide all the detailed information available to the Executive Branch.

I urge the Congress to carefully consider all the issues involved in the potential conflict that one national objective, attaining clean air, might have on our efforts to reach other goals.

THE WHITE HOUSE
WASHINGTON

June 26, 1975

ADMINISTRATIVELY CONFIDENTIAL

MEMORANDUM FOR: JIM CANNON
FROM: JIM CONNOR 
SUBJECT: AUTO EMISSIONS

Your memorandum of June 24th on the above subject has been reviewed by the President and the following was noted:

1. Release Statement of Facts and make specific recommendation to the Congress freezing the current standards for five years. APPROVED
2. Package it as a Presidential message or statement. APPROVED

Please follow-up with appropriate action.

cc: Don Rumsfeld

THE WHITE HOUSE
WASHINGTON

June 26, 1975

ADMINISTRATIVELY CONFIDENTIAL

MEMORANDUM FOR:

JIM CANNON

FROM:

JIM CONNOR *gl*

SUBJECT:

(AUTO EMISSIONS)

Your memorandum of June 24th on the above subject has been reviewed by the President and the following was noted:

1. Release Statement of Facts and make specific recommendation to the Congress freezing the current standards for five years. APPROVED
2. Package it as a Presidential message or statement. APPROVED

Please follow-up with appropriate action.



cc: Don Rumsfeld

Subj File

THE WHITE HOUSE

WASHINGTON

June 27, 1975

MEMORANDUM FOR THE PRESIDENT

FROM: JIM CANNON *Jim*
SUBJECT: Statement by the President on Auto Emissions

Attached (Tab A) for your approval is a statement announcing your previous decision that the Clean Air Act be amended to extend the current automobile emission standards from 1977 to 1981.

A detailed statement of facts contained in an Energy Resources Council memorandum (Tab B) will be released with your statement. Max Friedersdorf will have the appropriate Congressional notifications made so that we can release your statement at 3 p.m. today. Frank Zarb, John Barnum of DOT, John Quarles, Deputy at EPA, and Dr. Ted Cooper, HEW Assistant Secretary for Health and Science, will brief the press in the briefing room.

The statement has been approved by Bill Seidman, Robert T. Hartmann, Phil Buchen, Alan Greenspan, Jim Lynn, and Max Friedersdorf.

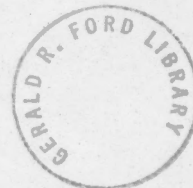
The text has been approved by Paul Theis.

RECOMMENDATION:

I recommend that you approve the statement.

Approve _____ Disapprove _____

Attachment



STATEMENT BY THE PRESIDENT

Earlier this year, I submitted to the Congress my proposed Energy Independence Act of 1975. In that comprehensive proposal, I recommended that the Congress modify provisions of the Clean Air Act of 1970 related to automobile emissions. I proposed strict emission controls that would still permit America to achieve a high-priority energy goal -- a 40 percent improvement in automobile fuel efficiency within four years.

Since that time, I have received information concerning potential health hazards from certain automobile pollution control devices first used on 1975 cars. In response to this information, I ordered an executive branch review of the problem and asked the appropriate officials to consider the various impacts of a range of emission alternatives as they relate to public health, energy goals, consumer prices and environmental objectives.

This review has now been completed. We have carefully surveyed this matter with many scientists and other qualified authorities. Although there is some disagreement on the data and conclusions, there is general accord that it is impossible to accurately predict the adverse impacts likely to result if we move to stricter automobile pollution standards now. Most of the experts agree that tighter emission controls will limit the fuel economy potential of our cars, and all agree that they will increase costs to the consumer.

As the automobile manufacturers have responded to Federal requirements to remove pollutants from automobile exhaust, other unregulated pollutants with potentially serious health implications have been produced. The same devices



designed to control some emissions may result in the creation or aggravation of other pollutants. The result of government-mandated changes to our automobiles could actually increase prices, without substantial environmental benefits but with possible new risk to the Nation's health.

As a result of actions already taken, the automobile is rapidly becoming less of a contributor to air pollution. A major part of our task is behind us. But it was the easiest part. We have now reached the point where the further incremental progress we all want can only be achieved slowly and at higher cost.

I, therefore, urge the Congress to consider how uncoordinated Federal laws mandating automobile fuel efficiency and emission control might work against each other, and how they will effect other national objectives such as public health and a strong economy.

In view of these considerations, I have decided to revise my Administration's position proposed in the Energy Independence Act. We simply cannot afford to be wrong on such serious policies. I have concluded that we should maintain the current automobile emission standards through model year 1981. This will enable us to achieve the following objectives:

- . Health. Avoid increasing the potential adverse health impacts of certain automobile emission devices by retaining current controls on known health hazards, such as carbon monoxide and hydrocarbons, without the risk of increasing other imperfectly understood but potentially dangerous pollutants such as sulfuric acid.

- . Energy. Achieve an increase of 40 percent or greater in automobile fuel efficiency by 1980.
- . Environment. Achieve almost all the environmental objectives we would have achieved by going to stricter standards.
- . Economy. Minimize the inflationary impact of Federal regulations on the cost of automobiles to consumers. Avoid aggravating unemployment, especially in the automobile industry.

I recognize that this position modifies the auto emission standards contained in my proposed Energy Independence Act of 1975 which I transmitted to the Congress on January 30. However, as pointed out in recent testimony during Congressional hearings, the Administrator of the Environmental Protection Agency has already noted that it is necessary to adjust the strict emission standards that I proposed. Administrator Train held hearings which considered the problem of sulfuric acid mist emitted from cars equipped with catalytic converters. Most new cars are equipped with the converter to meet current emission standards. The Administrator concluded that this is a potentially serious health hazard. The Secretary of Health, Education, and Welfare agrees.

Evidence brought out at the EPA hearings and by other Government reports, shows that current catalytic converters do not emit enough sulfuric acid to constitute any immediate danger. However, if the auto emission standards are further lowered, as would be required if no change is made in the current law, then changes in the catalytic converter control system would be mandatory. This could produce substantially more sulfuric acid. This poses a health risk which my advisers believe we should not accept.

The Nation needs long-term automobile fuel efficiency and emission control policies so that we can begin to build cars meeting responsible energy and environmental standards.



By replacing the current fleet with new cars offering more fuel efficiency while generating less pollution, we will make substantial progress toward our goals of better fuel efficiency, economic recovery and a healthier environment.

I deplore the delay in resolving the conflict between Federal energy and environmental policies and laws. Such delays will only contribute to further economic disruption and continuing unacceptable levels of unemployment. Lack of a comprehensive and balanced policy would allow one objective to go forward at the expense of other critical national goals.

It may be that additional Government standards will be required in future years. This is something which EPA and other Government agencies will work on in cooperation with the appropriate committees of Congress.

Today we cannot shirk our responsibility to make decisions that establish realistic ground rules. We cannot afford to ignore the sulfuric acid problem. But our response must be more than simply another Government decree that sets another standard that could create another problem. We have a positive obligation to ensure that the steps we take today do not aggravate potentially serious health hazards.

Other technical information was brought to my attention as I reached my automobile emissions decision. In addition to a statement of facts, which I am making public today, I have asked my advisers to consult with the appropriate members of the Congress, particularly the committees now considering legislation in this field. They will be available to discuss these complex and interrelated issues and to provide all the detailed information available to the executive branch.

I urge the Congress to carefully consider all the issues involved in the potential conflict that one national objective -- clean air -- might have on our efforts to reach other national goals.



June 27, 1975

ENERGY RESOURCES COUNCIL MEMORANDUM

Congress should amend the Clean Air Act by extending the current automobile emission standards from 1977 until 1981.

While this action will have no significant impact on our attempt to achieve the objectives of the Clean Air Act, the proposed modifications are necessary to (1) avoid certain recently recognized potential health risks associated with the catalytic converter and (2) permit substantially greater fuel efficiencies over the next five years. All of the enforcement, certification and inspection measures contained in the Clean Air Act will be retained.

Background

This proposal supersedes Section 503, Title V, of the President's Energy Independence Act of 1975 which he sent to Congress on January 30, 1975. At that time, the President proposed emission standards based on a modification of the current California standards.

After submitting the Energy Independence Act to the Congress, the Environmental Protection Agency held public hearings on the manufacturers' requests for a suspension of the 1977 auto emission standards and also took testimony related to five-year emission levels. The hearings established that the catalytic converter, used to meet the HC and CO standards for 1975 and 1976 model year vehicles, produces sulfuric acid in amounts that can pose a significant public health risk.

In addition, because of the technology likely to be used to achieve these tighter standards, automobile emissions of sulfuric acid may double if the more stringent HC and CO standards proposed in the Energy Independence Act are imposed for 1977 and subsequent years.

Accordingly, the President directed an interagency task force to undertake a major review of the public health, energy and consumer cost implications of several widely discussed levels of automobile emission standards.

The President's decision is based upon this review. Some of the more significant considerations which led to the President's recommendation are contained in his statement released today.

Additional information on those considerations is outlined below.

The Interagency Review

The review by Executive Branch agencies considered the implications of a range of alternative automobile emission requirements which might be applied to 1977 through 1981 model automobiles. Specifically, the following standards, applicable to hydrocarbons (HC), carbon monoxide (CO) and oxides of nitrogen (NOX) emissions have been considered:



	<u>Emissions in grams per mile</u>		
	<u>HC</u>	<u>CO</u>	<u>NOX</u>
Retain statutory standards which will apply to 1978 models	0.41	3.4	0.4
Energy Independence Act proposal covering 1977-81 models	0.9	9.0	3.1
EPA's March 5 conclusions			
- for 1977-79 models	1.5	15.0	2.0
- for 1980-81 models	.9	9.0	2.0
Continue standards applicable to 1975-76 models for 1977-81	1.5	15.0	3.1
Adopt Canadian 1975-76 standards for 1977-81 models	2.0	25.0	3.1
Reimpose standards applicable to 1973-74 models for 1977-81	3.0	28.0	3.1

Based upon this review, the following conclusions were reached:

1. Controls on automobiles necessary to meet the current standards have reduced ambient concentration levels in those areas that have auto-related HC and CO problems; and have reduced the rate at which NOX concentrations have increased.
2. Through the year 1985, tighter or looser standards for HC, CO and NOX, in the range being considered, will make little difference in the air quality in those areas that have an auto-related pollution problem, although many parts of the country have no auto-related pollution problem.
3. Present data are not sufficient to make specific calculations or final judgments on what sulfuric acid emission levels would be safe from a public health perspective. However, it is believed that sulfuric acid emissions could prove to be a significant public health risk and that emissions could increase substantially if standards more stringent than the 1975 interim standards are adopted.
4. Further mandated reductions in emissions from internal combustion engines may have the effect of increasing or creating pollutants other than CO, HC and NOX.
5. Auto emission standards have had an impact on fuel economy and, therefore, on our nation's total petroleum demands and reliance on foreign sources. Standards tighter than the 1975 interim will result in higher initial car costs and higher operating costs.
6. The basic philosophy and approach to future auto emission controls need to be reconsidered in light of current conditions.
 - (a) Significantly tighter standards at this time may preclude continued development of some promising fuel efficient and low emission technologies.
 - (b) Actions to reduce auto emissions must take into account other sources of the same pollutant.

7. Prompt Congressional action is needed on auto emission standards in order to establish a five-year emission program which is compatible with a strict fuel efficiency program.

DISCUSSION

1. Controls on automobiles necessary to meet the current standards have reduced ambient concentration levels in those areas that have auto-related HC and CO problems; and have reduced the rate at which NOX concentrations have increased.
2. Many populated areas of the country have no auto-related pollution problem. Through the year 1985, tighter or looser standards for HC, CO and NOX in the range being considered, will make little difference in the air quality in those areas that have an auto-related pollution problem.

The Clean Air Act has imposed increasingly more stringent automobile emission limitations. 1973-74 vehicles produce about 65 percent less HC and CO than uncontrolled (pre-1968) vehicles. 1975 vehicles, meeting the current standards, produce 83 percent less HC and CO and 11 percent less NOX than uncontrolled vehicles. The existing law, however, requires that these automobile emissions be reduced even further beginning with model year 1977 for NOX and model year 1978 for HC and CO.

The attached tables show the direction and magnitude of change in ambient concentration levels for HC, CO and NOX which would result from adopting standards which are less (or more) stringent than those proposed in the Energy Independence Act. The ambient standards are used as criteria because they are the health-related pollutant limits in each air quality region, toward which reductions in both automobile and stationary emissions contribute. Thus the levels shown are the result of mobile and stationary source emissions. Three points should be noted:

- First, though the tables assume that the statutory standards will be in force after the 1981 model year, if any of the options were kept through model year 1990, the concentration levels for each region would change very little and the conclusions reached remain basically the same.
- Second, because the concentration levels are projected through modeling techniques marginal changes in the concentration levels, whether increases or decreases, are often within the range of statistical error.
- Third, the estimates of total auto pollution emitted are based on historical growth rates for vehicles miles traveled and auto fuel economy. No compensation has been made for the higher cost of gasoline which already affected total pollutants through reductions in vehicle miles traveled.

Hydrocarbons

Out of the thirty regions considered to have an HC problem, twenty are projected to exceed the ambient standard in 1985, regardless of the automobile emission level chosen. More importantly, all of the regions projected to have concentration levels below the ambient standard in 1985 at the statutory vehicle limitation level are also projected to be below the ambient standard if any of the other less stringent automobile emission standards shown is chosen instead.

Only 25 percent of total hydrocarbon emissions are generated by automobile exhaust. Therefore, hydrocarbon ambient air concentrations tend to be much less sensitive than carbon monoxide to the level of vehicle emission control.

Attachment 1 shows the limited differential impact that vehicle hydrocarbon limitations more stringent than the 1975 (Interim) standard would have on ambient air quality by 1985 in those areas considered to have a hydrocarbon problem. The measure of air quality is photochemical oxidants to which hydrocarbons are converted and in which form HC most adversely affects air quality.

Carbon Monoxide

Carbon monoxide levels in the atmosphere are much more sensitive to changes in automobile emission controls than either HC or NOX. Unlike those pollutants, the growth of stationary sources over the next ten years will have little effect on CO air quality.

Attachment 2 shows 1985 projected concentration levels for twenty-six problem regions for each of the alternatives presented. The most important conclusion is that air quality is improving rapidly and will continue to improve until 1985 under all of the emission control options presented. This is because older uncontrolled cars are being replaced by newer controlled cars. The regions with asterisks are those which would still exceed the ambient standard if an automobile CO standard were adopted that was less stringent than either the statutory standard or the one proposed in the Energy Independence Act.

First, there is only a limited difference in ambient concentration levels for all of the standards presented, but the difference is particularly small when comparing the statutory standard (3.4 grams/mile) with either the Energy Independence Act proposal (9.0 grams/mile), EPA's recommended standard (15 grams/mile until 1979 and 9.0 grams/mile from 1979 to 1981), or the current standard (15 grams/mile) extended until 1981. By 1985, the average ambient levels for this pollutant will have been reduced about 70 percent below 1970 levels regardless of which option is chosen.

Second, the choice of option will not significantly affect any single area's ability to achieve or maintain the ambient standard by 1985. When comparing all the alternatives (except the 1974 or Canadian Standards), those areas below the ambient standard in 1985 will be below it regardless of the automobile emission standard chosen, with the sole exception of Denver. The adoption of the Canadian Standard would mean that only two additional areas (Portland, Oregon and Puget Sound) would still be above the ambient standard in 1985 by a marginal amount.

Nitrogen Oxides

Federal government and independent scientists predict that a steady increase in ambient nitrogen dioxide concentrations will occur in metropolitan areas over the next ten years regardless of the auto emission limit chosen. This is because stationary sources emit most NOX pollution and the technology for controlling stationary sources is very limited. Attachment 3 (b) shows the average percentage increases in NO2 ambient concentration levels that will occur for each of the auto emission alternatives studied (3.1, 2.0 and 0.4 grams/mile) under varying assumptions about the auto standard after 1981.

When comparing the 2.0 and 3.1 auto emission alternatives, Attachment 3 (B) shows that as long as the 2.0 NOX standard were implemented after 1981, no significant difference in the predicted increases of NO2 concentration levels would occur in either 1980 or 1985, as a result of maintaining the 3.1 grams/mile standard through the 1981 model year (columns 2 and 3).

Though the statutory standard would have a significant effect on the overall predicted increase, the differential effect of a more stringent automobile standard than currently in force on the ambient concentration levels in those areas with nitrogen dioxide problems is much less pronounced. This is shown in Attachment 3 (a), which displays ambient projected concentration levels in the ten problem areas for 1985 under various automobile emission standards.

With the exception of San Francisco, by 1985 all ten regions are predicted to have concentration levels above the ambient standard if either the 3.1 or 2.0 grams per mile limitation is placed on automobiles through the year 1980 (columns 1 and 3). San Francisco would remain below the standard if the more stringent emission limitation is adopted and, in fact, California has the more stringent limitation in force as a State regulation.

It should also be noted that regardless of whether the 3.1 or the 2.0 limitation is imposed through 1981, and even if the statutory standard (.4) is imposed after 1981, only one additional region (Phoenix) would be brought into compliance with the ambient standard (columns 4 and 5). In fact, implementing the statutory standard in 1978 would result in only two additional areas (Phoenix and Baltimore) meeting the standard (column 6).

It is, therefore, clear that the projected increases in nitrogen dioxide cannot be stopped without major technological innovations in stationary source control. Therefore, regardless of how stringent the automobile standard, the future concentration levels in major metropolitan areas will primarily be a function of stationary source emissions.

3. With present data experts generally agree that standards which are tighter or looser than those currently in force would have minimal differential health impacts -- especially for HC and CO. However, present data are not sufficient to make specific calculations or final judgments on what sulfuric acid emission levels would be safe from a public health perspective. It is only known that sulfuric acid emissions could prove to be a significant public health risk and that emissions would increase if standards more stringent than the 1975 interim standards are adopted.



4. Further mandated reductions in emissions from internal combustion engines may have the effect of increasing existing pollutants or creating other pollutants.

Health Impacts:

Based upon existing air quality data, there are no measurable health risks associated with the application of HC and CO emission standards (within the range of options presented) which are less stringent than those in the Energy Independence Act or the statutory standards.

The application of the 3.1 NOX level will not greatly increase health risks nationwide. With an ambient air quality standard of 100 ug/m³ health data suggests that the level at which people would have an increased risk for excess respiratory disease is 200 ug/m³. Los Angeles is the only area which is expected to approach the 200 ug/m³ level by 1985, and California has the lower 2.0 grams/mile level in effect as a State regulation.

Sulfuric Acid:

Though ambient carbon monoxide and hydrocarbon concentration levels are not significantly affected by the range of automobile emission standards presented, the concentrations of sulfuric acid are affected.

Gasoline contains sulfur which, after combustion, is released as sulfur dioxide. In the process of removing other pollutants the catalytic converter changes some of the sulfur dioxide into sulfuric acid mist.

Current estimates indicate that with existing automobile emission technology, emission standards for hydrocarbons and carbon monoxide of .9 and 9.0, will require the use of air-injected oxidation catalysts. This catalyst results in a substantial increase of sulfuric acid emissions. Though there are several catalytic and non-catalytic technologies which can potentially meet the stricter HC, CO and NOX emission limitation without significant sulfuric acid emissions, there is little production potential for using these systems in the near term. (See discussion below).

While all scientists agree that sulfuric acid is a toxic and potentially dangerous pollutant, there is still disagreement on the quantities of emissions needed to pose a health risk and on how long it would take for the buildup in concentration levels to occur.

Major studies by government and industry have already begun in order to resolve some of these uncertainties. Much of the unknown about sulfuric acid results from our current inability to precisely measure how much sulfuric acid is being emitted by vehicles and our inability to precisely measure how much emitted sulfuric acid is being concentrated in the breathing zone.

To improve vehicle measurements, EPA is developing a new test driving cycle which will more accurately reflect emission of sulfuric acid and is jointly working with private industries on the relationship of catalysts and other control options to sulfuric acid. To improve our knowledge of the disposition of sulfuric acid once emitted into the air, EPA has instituted a long run trend study on one major highway and has jointed with State government agencies to measure roadside

concentrations on other highways as well. EPA is also working with the State agencies to determine the change in sulfuric acid emissions as catalyst equipped vehicles age and accumulate mileage.

Until these and other studies are completed no final judgments on the potential health impacts of sulfuric acid emissions can be made. However, recent information presented in EPA's "Estimated Public Health Impact as a Result of Equipping Light Duty Motor Vehicles With Oxidation Catalysts" (January 30, 1975) suggested the following estimates of the years in which sulfuric acid emission levels from automobiles could pose a serious threat to public health.

<u>Standard</u>	<u>Model Year 1/ in which Sulfuric Acid could pose a serious health problem</u>	
	<u>Average Meteorological Conditions</u>	<u>Adverse Meteorological Conditions 2/</u>
1975 Interim Standards	1981	1979
1975 California Standards		
In 49 States	1979	1977
In California 3/	1978	1977

- 1/ The data assumes that there are no emissions of sulfates from stationary sources, and that 70 percent and 90 percent of the fleet in 1975 and 1976 respectively will utilize catalysts.
- 2/ Adverse meteorological conditions would occur in large metropolitan areas on an average of 6-7 days a year.
- 3/ The dates for reaching a critical problem are earlier in California than the remaining 49 States because California utilizes higher sulfur gasoline.

In interpreting the preceding table the following factors should be noted. Data available to date do not take into account "background" emissions of sulfates from stationary sources, e.g., coal-fired generating plants. Therefore, the table represents only the potential health effects of emissions from mobile sources. The extent to which sulfate emissions from stationary sources add to the potential health risk associated with sulfuric acid emissions from automobiles is not known at this time. However, most health analyses treat stationary source and mobile source emissions of sulfates independently. This is primarily because (1) the particle size of sulfates from stationary sources is much larger than sulfuric acid mist and is not absorbed as deeply into the respiratory system; (2) the toxicity of sulfate emissions from stationary sources is generally much less than sulfuric acid; and (3) emissions from stationary sources do not occur in the breathing zone as do automobile emissions.



Under certain adverse meteorological conditions localized sulfuric acid problems could occur. There are two short-term actions available to offset this possibility. While feasible, both have drawbacks.

- Gasoline blending - catalysts equipped vehicles could be provided with lead-free low-sulfur fuel. This would reduce emissions of sulfuric acid, but would impose an allocation problem on the industry. Refiners have also indicated that sufficient quantities would not be available to meet widespread problems beyond 1977 or 1978.
- Desulfurization of oil - technically possible at this time. Desulfurization would require substantial additional capital investment, at a time when refiners are attempting to expand domestic capacity. It would also require an increase in crude oil consumption due to additional refining. Increases in the price of gasoline would occur. Nationwide, the capital cost of desulfurization would range between \$2 and \$4 billion, crude oil consumption would increase .5 percent and the price of gasoline would increase by 1 to 2 cents per gallon.

Actions That May Increase or Create Pollutants:

It is generally agreed that reducing NOX emissions will result in an increase in the emissions of HC from engines. To reduce that increment manufacturers may increase the use of the air-injected oxidation catalyst -- even to meet the Federal Interim HC and CO standards. If this were the case, then nearly twice as much sulfuric acid would be generated as projected. At this time it is not known definitely whether manufacturers could achieve reductions of the HC increment through the use of engine modifications or modified catalyst equipment instead of the air-injected catalysts in 1977-78. However, if the HC and CO standards are also lowered after model year 1978 there is a high probability that the air-injection catalyst would be retained throughout the entire period.

There are other anecdotal problems with the converters such as potential fire hazards, hydrogen sulfide emissions and the creation of other potentially hazardous compounds, but none of these has been proven a significant risk.

Mandated reductions in the automobile emission standard will also narrow the choice of technological options to abate the three regulated pollutants. For example, if a sulfuric acid standard were set for model year 1979, implementation of the statutory standards for HC, CO and NOX in 1978 would, in essence, dictate the use of either "dual" or "three-way" catalyst technologies on most vehicles. While these catalysts have promise as abatement technologies they are still in the early stages of development and their premature implementation could possibly have adverse health effects far in excess of the benefits of reducing HC, CO and NOX.

Based on existing data, the dual catalyst system appears to be the most promising technology for meeting the statutory emission standards. However, its ability to limit sulfuric acid emissions to low concentrations, and thus meet a sulfuric acid standard, is still in question since an integral component of the dual catalyst system is an oxidation catalyst like those

currently in use for 1975 model vehicles. Sulfuric acid emissions would increase if, to meet the statutory HC and CO standards, an air-injected oxidation catalyst were used.

If the statutory standards are in effect in 1978, along with a sulfuric acid standard in 1979, then it appears that the most likely technology to be used is the three-way catalyst -- a single device that simultaneously abates HC, CO and NOX.

However, to achieve these simultaneous reductions, extensive redesign and control of the fuel induction system must be undertaken because the three-way catalyst must be operated at stoichiometric (no excess air) conditions. In fact, the permitted margin of error is so narrow (on the order of ± 0.50 percent of the exact air to fuel ratio needed, as compared to normal production variations of ± 7 to 10 percent) that the use of an oxygen sensor and a feedback system are required to regulate the air mixture for either a carburetor or fuel-injection process.

When operating at the stoichiometric conditions, sulfate emissions would be no greater than emissions from non-catalyst cars. However, if variations from that condition occur, severe adverse health effect may be generated. Three-way catalysts applied to exhausts from engines operated outside the carburetion design limits (variations greater than ± 0.50 percent from stoichiometric) have a potential for emitting dangerous quantities of such toxic pollutants as hydrogen sulfide, carbon disulfide, carbon disulfide and hydrogen cyanide.

It should be emphasized that only the most preliminary data exists on the total emissions from three-way catalysts and no firm judgment can be made on whether or not such emissions will occur in normal use, or in what quantities they will occur. However, they must be treated as potential risks until there is firm evidence that demonstrates otherwise. The development of this technology has not progressed to the stage where firm conclusions on their long run health impacts are possible.

The long run durability of this technology is also unproven at this time and several more years of testing and development seem needed before full scale introduction of three-way catalysts should be undertaken regardless of the emission standard mandated. Furthermore, the required changes in the fuel induction system would most likely require the use of electronic fuel injection, which is now available from component manufacturers only in very limited quantities. These manufacturers testified at the EPA suspension hearings that, after a decision had been made to use electronic fuel injection systems on a widespread basis, from 3 to 5 years would be required to design, manufacture, and deliver these components.

It seems clear, that given the limited health benefits derived from instituting the statutory standards (see #2 above) and given the unknown but potentially adverse health effects of introducing a technology which has not been thoroughly tested, the wiser choice is to avoid forcing either of these catalyst technologies into mass production at this time.

5. Auto emission standards have had an impact on fuel economy and, therefore, on our Nation's total petroleum demands and reliance on foreign sources.

The options presented will have differential fuel economy impacts.

<u>Impact on 40 percent fuel economy goal</u>		
<u>Alternatives</u>	<u>% over 1974</u>	<u>Shortfall (-) or excess (+) over President's goal</u>
Statutory Standards after 1977	14-30%	-10 to -26%
Energy Independence Act	40%	--
EPA Recommendation	36%	- 4%
1975 Standards thru 1981	46%	+ 6%
Canadian & 1974 Standards thru 1981	46%	+ 6%
<u>Alternatives*</u>	<u>Barrels per day (in 1980)</u>	
Statutory Standards after 1977	224,000 - 411,000 (loss)	
Energy Independence Act	85,000 (loss)	
EPA Recommendation	137,000 (loss)	
1975 Standards thru 1981	0	
Canadian and 1974 Standards thru 1981	0	

* Base is 1975 model year automobiles meeting 1975 interim emission standards.

Energy Implications for lowering NOX to 2.0 grams/mile

It is generally agreed that a reduction in the NOX emission levels from 3.1 to 2.0 grams/mile will require engine modifications. It is estimated that these modifications will result in a fuel economy penalty of 3-4 percent on the average in 1980. If a 3 percent fuel penalty is assumed, an additional requirement of 85,000 barrels of oil per day will occur nationwide in 1980.

This estimated fuel penalty figure is the subject of debate, however, on two grounds. First, it has been argued that fuel penalties in 1980 assume that certain advanced engine technologies will be introduced over the next five years. However, these advanced technologies would not be available in the first two years. Therefore, at the year of introduction, initial fuel penalty resulting from lower NOX emission standards would be substantially greater. A range of between 5 and 7 percent, i.e., from 120,000 to 150,000 barrels per day is estimated, if the 2.0 grams/mile standard were adopted.

The second argument revolves around the very sensitive relationship that exists between fuel economy and NOX emissions at more stringent NOX standards than currently required. For a given level of HC emissions a dramatic drop in fuel economy is required to meet a NOX standard below 2.0 grams/mile. Because of mass production variations, to ensure that emission standards are met, manufacturers must design their emission systems well below the Federal standards -- about 23 percent lower. Thus, to meet a 3.1 gram/mile limitation, vehicles are designed to achieve 2.4 grams/mile and to achieve a 2.0 level, vehicles are designed to emit not more than 1.3 to 1.5 grams/mile. (To meet the

statutory .4 grams/mile vehicles would have to be designed to meet about .3 grams/mile). Thus, designing vehicles to meet even the 2.0 standard places the fuel economy loss well within the sensitive range at which fuel economy begins to drop most rapidly. Attachment 4 (a) illustrates the general relationship between fuel economy and NOX emissions for all spark ignition engines while 4 (b) shows the situation for a specific class of V-8 engines.

Energy Implications of HC and CO Standards Tighter Than Those Currently In Force

Assuming a 3.1 gram/mile NOX standard, a fuel economy penalty of 3 to 5 percent is associated with emission standards for hydrocarbons and carbon monoxide of .9 and 9.0 grams/mile when compared to extending the current standards of 1.5 and 15 (i.e., 85,000 barrels of oil per day in 1980). Retention of the 1.5 (CO) and 15 (HC) levels until 1979 would avoid most of the penalty. Retention of the current standards through 1981 would allow continued fuel economy improvements as would the adoption of the Canadian standards.

Energy Implications of the Statutory Standards for HC, CO and NOX

With either the dual or three-way catalyst, a single device is used to abate all three regulated pollutants. Thus, at the statutory standards the energy impacts are not measured separately for NOX and HC/CO. On the average, the adoption of the statutory standard in 1978 would result in a fuel penalty of 7 to 17 percent by 1980 over 1975 vehicles. This would mean an energy loss of 224,000 to 411,000 barrels of oil per day in 1980.

Attachment 5 shows the specific fuel economy losses (or gains) associated with each of the options presented (and the anticipated costs) with respect to model year 1974.

Standards Tighter Than the 1975 Interim Will Result in Higher Initial Car Costs and Higher Operating Cost Due to Associated Fuel Penalties

The options presented will impose varying cost burdens on the consumer. Also, separate costs are associated with actions on NOX and actions on HC and CO, except for meeting the statutory standards with a dual or three-way catalyst system.

NOX:

Consumers will face sticker price and operating cost increases over the 1975 model vehicles if a 2.0 gram/mile limitation is imposed. Estimates range from \$10-25 for front-end costs per vehicle and from \$0-25 in operating costs over 50,000 miles. In addition, the consumers will pay the costs of increased fuel consumption associated with this lower standard, which rough estimates place at \$1.7 million per day, or over 600 million dollars per year.

HC and CO:

The costs of adopting the more stringent hydrocarbon and carbon monoxide standards (.9 and 9.0) as proposed in the Energy Independence Act is estimated to be \$50 per vehicle over 1975 automobiles. This would represent the additional costs of using the air-injected oxidation catalyst. Additional operating costs, which would result from the increased consumption of gasoline, are estimated at \$1.7 million per day, or over 600 million dollars per year.

Statutory HC, CO and NOX:

Adoption of the statutory standards would result in a sticker price increase of \$230 to \$270 per vehicle over 1975 model cars. This would represent the average costs of using a mix of the dual and three-way catalyst systems. Operating costs resulting from the associated fuel penalties of this alternative would roughly be \$4 million per day or over \$1.5 billion per year.

6. The basic philosophy and approach to future auto emission controls needs to be reconsidered in light of current conditions

While the choice of emission standards must represent a balance among public health, air quality, esthetic, energy and cost considerations, the problems currently confronting the Nation are different from those prevailing in 1970 when the Clean Air Act was passed. Inflation, unemployment, and the added cost and reduced availability of energy call for reassessment of the relative weights accorded to various factors other than measures necessary to health. The high cost and fuel penalties caused by further tightening of the standards; and the emergence of the sulfuric acid problem, compared to the marginal improvement in HC, CO and NOX air quality also call for careful reconsideration.

(a) Significantly tighter standards at this time may preclude continued development of some technologies

There is substantial evidence that by model year 1981 new "lean-burn" or stratified charge" engines would permit meeting the lower (2.0) NOX standard. However, NOX standards more stringent than 2.0 would preclude introduction of those technologies. In fact, unless application of the current statutory NOX standard (.4 grams/mile) is delayed through at least 1990, the industry will not (and cannot) shift to a lean-burn or stratified charge engine, as far as can be foreseen.

(b) Actions to reduce auto emissions must take into account other sources of the same pollutant

Only 25 percent of total HC emissions are generated by automobile exhaust. Therefore, HC ambient air concentrations tend to be much less sensitive to the level of vehicle emission control than is carbon monoxide.

The projected increases in NOX cannot be stopped without major technological innovations in stationary source control. Therefore, regardless of how stringent an automobile standard is applied, the future concentration levels in major metropolitan areas will primarily be a function of stationary source emissions.

CO levels in the atmosphere are much more sensitive to changes in automobile emission controls than either HC or NOX. Unlike those pollutants, the growth of stationary sources over the next ten years all have little effect on CO air quality.

7. Prompt Congressional action is needed on auto emission standards

In order to meet deadlines for emission testing and certification of 1977 model cars, the automobile industry will need to know 1977 emission standards by early August 1975 so that there will be time to complete designing and engineering, build prototypes, complete emissions testing such as 50,000 mile endurance tests, and finally to produce new cars in adequate quantity to meet the demand from the American public.

Predicted Ambient Oxidant Concentration Levels in 1985

(In parts per million)

Ambient Standard = .08 ppm*

HC Automobile Emission Standard

<u>Region</u>	<u>1974 and Canadian Standards through 1981</u>	<u>Current Stds through 1981</u>	<u>EPA's Recom- mended Stds</u>	<u>Energy Independ- ence Act Proposal</u>	<u>Statutory Stds 1977-1990</u>	<u>Base 1971-73</u>
Birmingham	.12	.12	.11	.11	.11	.22
Mobile-Pensacola	.04	.04	.04	.04	.04	.11
Clark-Mohave	.13	.12	.12	.12	.12	.22
Phoenix-Tucson	.16	.16	.16	.16	.16	.19
Los Angeles	.43	.42	.42	.41	.41	.62
Sacramento Valley	.21	.20	.20	.20	.20	.24
San Diego	.20	.20	.20	.19	.19	.30
San Francisco	.23	.23	.23	.23	.23	.30
San Joaquin	.22	.21	.21	.21	.21	.26
S.E. Desert	.32	.32	.32	.32	.32	.28
Denver	.17	.16	.16	.16	.16	.28
NY-NJ-Conn.	.14	.13	.13	.13	.13	.26
Philadelphia	.10	.10	.10	.10	.10	.20
National Capital	.26	.26	.25	.25	.25	.38
Cincinnati	.12	.11	.11	.11	.11	.17
Indianapolis	.08	.08	.08	.08	.08	.14
S. Lou.-S.E. Texas	.20	.20	.19	.19	.19	.32
Boston	.11	.10	.10	.10	.10	.21
Toledo	.07	.07	.07	.07	.07	.14
El Paso-Las Cruces	.06	.06	.05	.05	.05	.13
Genessee-Finger Lakes	.08	.08	.08	.08	.07	.15
Dayton	.13	.12	.12	.12	.12	.18
Portland, Oregon	.08	.08	.08	.08	.08	.14
S.W. Penn.	.12	.12	.11	.11	.11	.21
Austin-Waco	.07	.07	.07	.07	.07	.16
Corpus-Christi	.14	.14	.14	.14	.14	.19
Dallas-Ft. Worth	.05	.05	.05	.05	.04	.13
Houston-Galveston	.27	.27	.27	.27	.26	.32
San Antonio	.07	.07	.07	.07	.06	.15
Puget Sound	.08	.08	.08	.08	.08	.16

* The projected concentration levels assume the continuance of historic growth rates in the central business districts in each region.

The effect of a higher, areawide or "metropolitan growth rate" on oxidant concentrations was also considered. The metro-growth rate assumes a much higher rate of growth in vehicle miles traveled and includes entire metropolitan areas rather than central business districts alone. However, predicted ambient concentration levels for oxidants using the higher growth rate are only marginally higher than predicted concentration levels using the CBD growth rate for all the HC auto-emission alternatives studied. More importantly, only three areas (Indianapolis, Genessee-Finger Lake and San Antonio) which would achieve the standard using the CBD growth rate, would exceed the standard by a very marginal amount if the higher metro-growth rate were assumed.

Therefore, assumption of the higher growth rate would not change the above analysis or conclusions about the impact of HC auto standards on photochemical oxidant concentration levels.

Predicted Ambient Carbon Monoxide Concentration Levels in 1985
(In parts per million)
Ambient standard = 9 ppm

CO Automobile Emission Standard

Region	1974 and Canadian Standards through 1981	Current Stds through 1981	EPA's Recom- mended Stds	Energy Independ- ence Act Proposal	Statutory Stds 1977-1990	Base 1971-73
Birmingham	6	5	5	5	4	18
North Alaska	11	11	11	11	11	35
Clark-Mohave	6	6	5	5	5	15
Phoenix-Tucson	16	14	14	13	12	42
Los Angeles	13	12	11	11	10	41
Sacramento Valley	7	6	6	6	5	22
San Diego	5	5	5	5	4	15
San Francisco	6	6	6	6	6	18
San Joaquin	4	3	3	3	3	13
Denver*	11	11	9	9	8	33
Hartford-New Haven	9	9	7	7	7	27
NY-NJ-Conn.	15	13	13	13	11	51
Philadelphia	9	8	8	8	8	32
National Capital	7	6	6	6	6	20
E. Washington-						
N. Idaho	7	7	6	6	6	18
Chicago	7	6	6	5	5	23
Indianapolis	5	4	4	4	4	15
Kansas City	6	5	5	5	4	15
Baltimore	7	7	7	7	6	18
Boston	6	5	5	5	4	18
Minneapolis-						
St. Paul	9	8	8	7	7	22
Central New York	5	4	4	4	4	15
Portland, Oregon**	10	8	8	8	7	26
S.W. Penn.	7	6	6	6	5	22
Wasatch Front	15	13	13	13	11	41
Puget Sound**	10	8	8	8	7	24

*Would not meet the ambient standard in 1985 if the Current Interim, 1974 or Canadian CO standard for vehicles were adopted through 1981

**Would meet the ambient standard under all options except the 1974 or Canadian vehicle CO standard

Nitrogen Dioxide

Chart A displays ambient concentration levels in 1985 for NO₂ in the ten problem regions under various NOX auto-emission standards. For example, column 1 shows that if a 3.0 gr/mile auto-NOX standard were in force from 1977 to 1990, Philadelphia's ambient NO₂ concentration levels in 1985 are predicted to be 121 ug/m³. Column 5 shows that if an NOX standard of 2.0 gr/mile were adopted for the 1977-1981 period, followed by the statutory (.4) standard until 1990, then Philadelphia's ambient NO₂ level in 1985 is predicted to be 113 ug/m³.

Chart B shows the average percentage increases in NO₂ concentration levels for all ten regions for each alternative NOX level. For example, column 2 shows that if the NOX emission level were 3.1 gr/mile from 1977-1981 and 2.0 gr/mile from 1982-1990, the NO₂ concentration levels are predicted to increase by 16% in 1980 and by 26% in 1985. Column 3 shows that if the NOX standard were 2.0 from 1977 to 1990, NO₂ levels are predicted to increase by 12% and 22% in 1980 and 1985 respectively.

A. Predicted Ambient Nitrogen Dioxide Concentrations in 1985
(In micrograms per cubic meter)

Ambient standard is 100 micrograms per cubic meter*

<u>Effective Date of Standard</u>	<u>(NOX Emission Standard (in grams per mile)</u>					
	(1)	(2)	(3)	(4)	(5)	(6)
1977-1981	3.1	3.1	2.0	3.1	2.0	0.4(1978)
1982-1990	3.1	2.0	2.0	.4	.4	0.4
<u>Region</u>						
Phoenix	111	105	100	98	93	87
Los Angeles	194	183	173	167	157	145
San Francisco	102	96	92	89	83	77
Denver	135	129	125	123	117	112
NY-NJ-Conn.	144	139	136	132	129	124
Philadelphia	121	119	117	115	113	109
National Capital	116	111	107	105	101	96
Chicago	152	148	145	143	139	134
Baltimore	116	112	109	107	103	99
Wasatch Front	137	131	124	121	115	108

B. Increases in Concentration Levels in 1980 and 1985

Average per-	1980	16	16	12	16	12	6
cent increase							
in air quality	1985	32	26	22	19	14	8
concentrations							

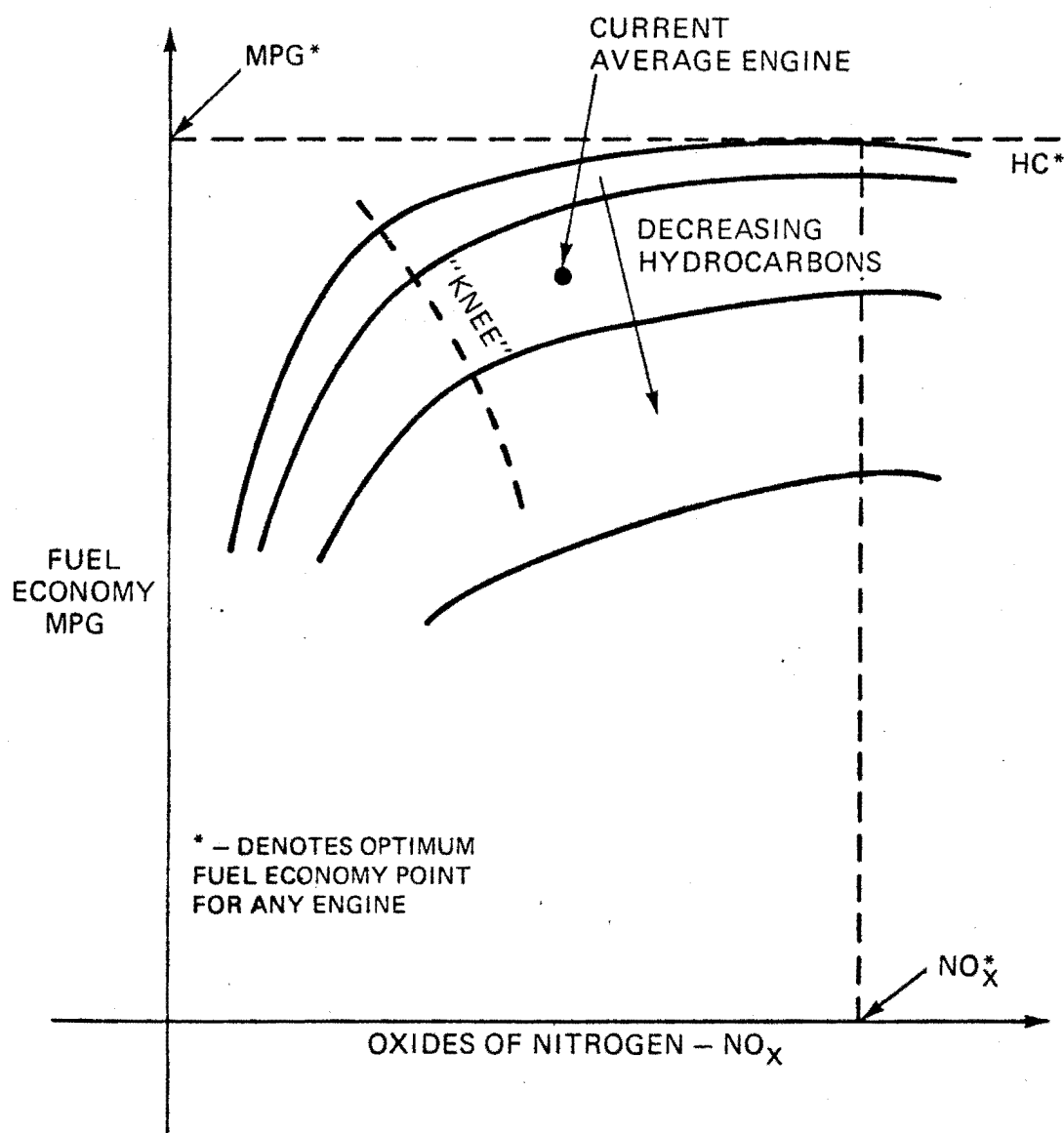
*The projected concentration levels assume the continuance of historic growth rates for the central business districts in each region. The effect of a higher, areawide or "metropolitan growth rate" on NO₂ concentrations was also considered. The metro-growth rate assumes a much higher rate of growth in vehicle miles traveled (VMT) and includes entire metropolitan areas rather than central business districts alone. Ambient levels of NO₂, using the metro-growth rate were considerably higher under all the auto-emission alternatives presented. When comparing 1985 percentage increases (Chart B) using a metro-growth rate as opposed to the CBD growth rate, average NO₂ concentration levels are predicted to increase by 46% as compared to 33% for a long term 3.1 gr/mile NOX standard (Column 1); 33% as compared to 22% for a long term 2.0 gr/mile NOX standard (Column 3) and 16% as compared to 8% for the statutory standard (Column 6).

The higher predicted NO₂ concentration levels that result from assuming the metro-growth

Nitrogen Dioxide cont'd.

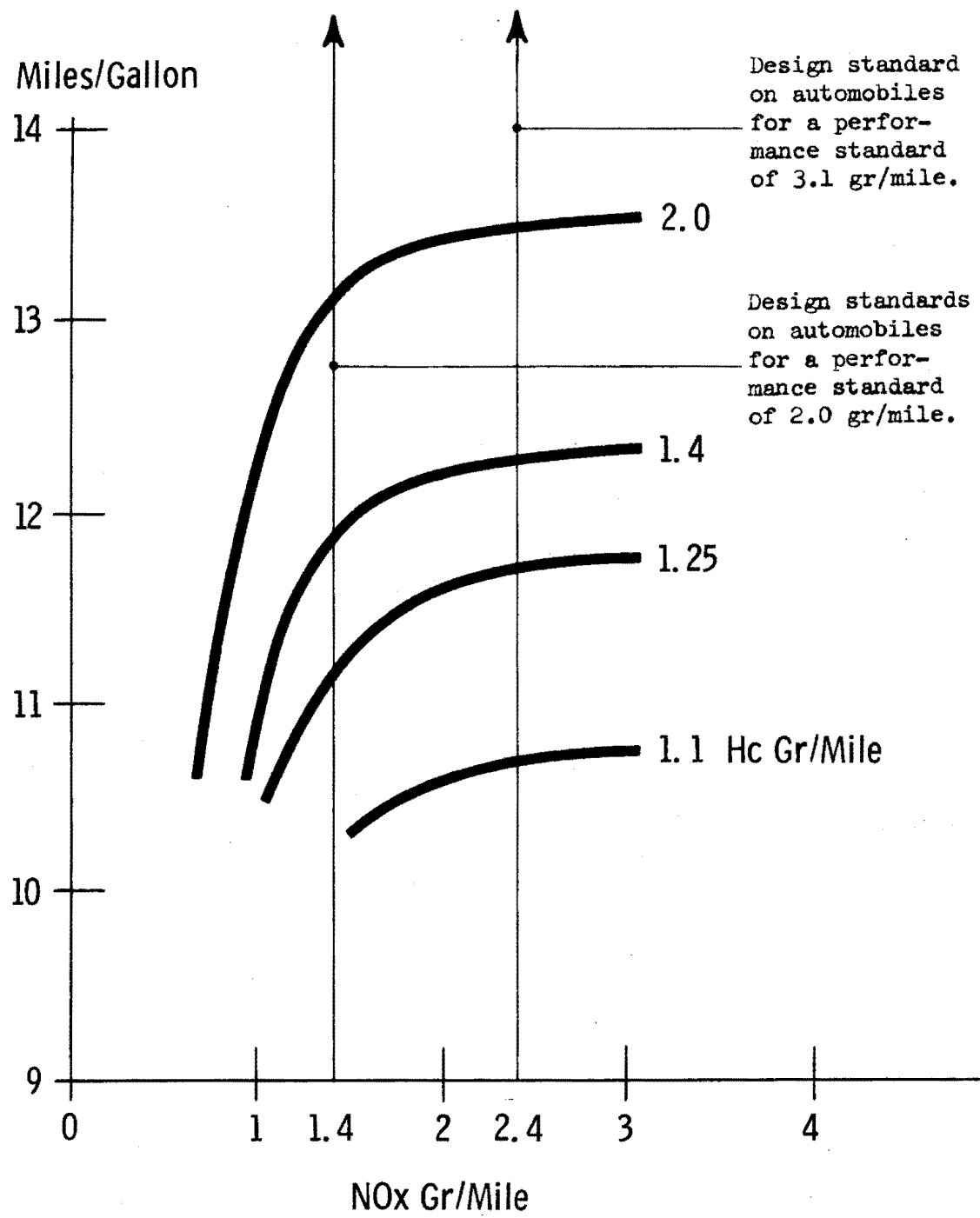
rate strongly suggest that the choice of NOX emission standard for automobiles would have even less impact on the ability of communities to maintain the ambient standard than is the case above, using the CBD growth rate. In fact, if the higher growth rate is assumed, all ten regions are predicted to exceed the ambient NO2 standard by 1985 regardless of the auto emission limit chosen for NOX. The only exception would be San Francisco, which would stay below the standard if the statutory auto standard for NOX were implemented in 1978.

MAXIMUM FUEL ECONOMY POTENTIAL VERSUS EMISSIONS
FOR 1980 ENGINES UNDER OPTIMAL CONTROL



- NOTE: 1. CURVE SHAPES ARE REPRESENTATIVE OF MOST ALL SPARK IGNITION ENGINES.
2. STATUTORY NO_x STANDARD IS BELOW THE "KNEE" FOR ALL ENGINES CAPABLE OF LARGE SCALE PRODUCTION THROUGH THE MID 1980's'
3. THE OPTIMUM-MPG* AND RESULTING NO_x* AND HC* ARE SIGNIFICANTLY GREATER THAN THE ENGINE OUT PERFORMANCE OF 1975 CARS.

FUEL-ECONOMY-NOX EMISSION TRADE OFF



1980 New Car Fuel Economy and Cost
Versus Emission Standards

Emission Standards For 1977-1981	Cost Per New Car For Emission Controls Compared to 1974 Cars		New Car Average Fuel Economy in 1980			
	Cost	Uncertainty	MPG	% Over 1974	Uncertainty Range in % Over 1974 Due to	
					Engine Technology	Sales Mix
1. Statutory Standards after 1977 (three-way catalyst or dual catalyst)	\$350	\$215-\$450	16.0*	14%*	-4% to + 8%	-4% to +7%
2. Base - 1.5/15/2.0 or 0.9/9.0/3.1						
With Catalysts	120	\$ 90-\$150	19.6	40%	-3% to + 3%	
No Catalysts	50	\$ 40-\$100	18.4	31%	-4% to + 8%	-4% to +7%
3. EPA Proposal						
With Catalysts	135	\$100-\$170	19.0	36%	-5% to + 8%	
No Catalysts	65	\$ 50-\$110	17.8	27%	-4% to +12%	-4% to +7%
4. 1975 Standards						
With Catalysts	95	\$ 70-\$110	20.4	46%	-2% to + 2%	
No Catalysts	35	\$ 25-\$ 65	19.2	37%	-3% to + 7%	-4% to +7%
5. Canadian or 1974 Standards						
With or Without Catalysts	25	\$ 5-\$ 35	20.4	46%	-2% to + 1%	-4% to +7%

*FEA - DOT Estimate

June 27, 1975

Office of the White House Press Secretary

THE WHITE HOUSE

FACT SHEET

Amendments to the Clean Air Act
(affecting automobile emission standards)

The President recommended today that Congress pass legislation designed to amend the Clean Air Act by extending the current automobile emission standards from 1977 until 1981.

While this action will have no significant impact on our efforts to achieve the objectives of the Clean Air Act, the proposed modifications are necessary to (1) avoid certain recently recognized potential health risks associated with the catalytic converter and (2) permit substantially greater fuel efficiencies over the next five years.

All of the enforcement, certification and inspection measures contained in the Clean Air Act will be retained.

This proposal supercedes Section 503, Title V, of the President's Energy Independence Act of 1975 which he sent to Congress on January 30, 1975. At that time, the President proposed emission standards based on a modification of the current California standards.

BACKGROUND

After submitting the Energy Independence Act to the Congress, the Environmental Protection Agency held public hearings on the manufacturers' requests for a suspension of the 1977 auto emission standards and also took testimony related to five-year emission levels. The hearings established that the catalytic converter, used to meet the HC and CO standards for 1975 and 1976 model year vehicles, produces sulfuric acid in amounts that can pose a significant public health risk.

In addition, because of the technology likely to be used to achieve these tighter standards, automobile emissions of sulfuric acid may double if the more stringent HC and CO standards previously proposed in the Energy Independence Act are imposed for 1977 and subsequent years.

Accordingly, the President directed an interagency task force to undertake a major review of the public health, energy and consumer cost implications of several widely discussed levels of automobile emission standards. The President's decision announced today is based upon this review.

more



The President will propose legislation to maintain the current automobile emission standards through model year 1980. This will accomplish the following objectives:

- . Health. Avoid increasing the potential adverse health impacts of certain automobile emission devices by retaining current controls on known health hazards, such as carbon monoxide and hydrocarbons, without the risk of increasing other imperfectly understood but potentially dangerous pollutants such as sulfuric acid.
- . Energy. Achieve an increase of 40 percent or greater in automobile fuel efficiency by 1980.
- . Environment. Achieve almost all the environmental objectives we would have achieved by going to stricter standards.
- . Economy. Minimize the inflationary impact of Federal regulations on the cost of automobiles to consumers. Avoid aggravating unemployment, especially in the automobile industry.

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June 27, 1975

Office of the White House Press Secretary

THE WHITE HOUSE

STATEMENT BY THE PRESIDENT

Earlier this year, I submitted to the Congress my proposed Energy Independence Act of 1975. In that comprehensive proposal, I recommended that the Congress modify provisions of the Clean Air Act of 1970 related to automobile emissions. I proposed strict emission controls that would still permit America to achieve a high-priority energy goal -- a 40 percent improvement in automobile fuel efficiency within four years.

Since that time, I have received information concerning potential health hazards from certain automobile pollution control devices first used on 1975 cars. In response to this information, I ordered an executive branch review of the problem and asked the appropriate officials to consider the various impacts of a range of emission alternatives as they relate to public health, energy goals, consumer prices and environmental objectives.

This review has now been completed. We have carefully surveyed this matter with many scientists and other qualified authorities. Although there is some disagreement on the data and conclusions, there is general accord that it is impossible to accurately predict the adverse impacts likely to result if we move to stricter automobile pollution standards now. Most of the experts agree that tighter emission controls will limit the fuel economy potential of our cars, and all agree that they will increase costs to the consumer.

As the automobile manufacturers have responded to Federal requirements to remove pollutants from automobile exhaust, other unregulated pollutants with potentially serious health implications have been produced. The same devices designed to control some emissions may result in the creation or aggravation of other pollutants. The result of government-mandated changes to our automobiles could actually increase prices, without substantial environmental benefits but with possible new risk to the Nation's health.

As a result of actions already taken, the automobile is rapidly becoming less of a contributor to air pollution. A major part of our task is behind us. But it was the easiest part. We have now reached the point where the further incremental progress we all want can only be achieved slowly and at higher cost.

I, therefore, urge the Congress to consider how uncoordinated Federal laws mandating automobile fuel efficiency and emission control might work against each other, and how they will effect other national objectives such as public health and a strong economy.

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In view of these considerations, I have decided to revise my Administration's position proposed in the Energy Independence Act. We simply cannot afford to be wrong on such serious policies. I have concluded that we should maintain the current automobile emission standards through model year 1981. This will enable us to achieve the following objectives:

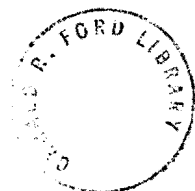
- . Health. Avoid increasing the potential adverse health impacts of certain automobile emission devices by retaining current controls on known health hazards, such as carbon monoxide and hydrocarbons, without the risk of increasing other imperfectly understood but potentially dangerous pollutants such as sulfuric acid.
- . Energy. Achieve an increase of 40 percent or greater in automobile fuel efficiency by 1980.
- . Environment. Achieve almost all the environmental objectives we would have achieved by going to stricter standards.
- . Economy. Minimize the inflationary impact of Federal regulations on the cost of automobiles to consumers. Avoid aggravating unemployment, especially in the automobile industry.

I recognize that this position modifies the auto emission standards contained in my proposed Energy Independence Act of 1975 which I transmitted to the Congress on January 30. However, as pointed out in recent testimony during Congressional hearings, the Administrator of the Environmental Protection Agency has already noted that it is necessary to adjust the strict emission standards that I proposed. Administrator Train held hearings which considered the problem of sulfuric acid mist emitted from cars equipped with catalytic converters. Most new cars are equipped with the converter to meet current emission standards. The Administrator concluded that this is a potentially serious health hazard. The Secretary of Health, Education, and Welfare agrees.

Evidence brought out at the EPA hearings and by other Government reports, shows that current catalytic converters do not emit enough sulfuric acid to constitute any immediate danger. However, if the auto emission standards are further lowered, as would be required if no change is made in the current law, then changes in the catalytic converter control system would be mandatory. This could produce substantially more sulfuric acid. This poses a health risk which my advisers believe we should not accept.

The Nation needs long-term automobile fuel efficiency and emission control policies so that we can begin to build cars meeting responsible energy and environmental standards. By replacing the current fleet with new cars offering more fuel efficiency while generating less pollution, we will make substantial progress toward our goals of better fuel efficiency, economic recovery and a healthier environment.

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I deplore the delay in resolving the conflict between Federal energy and environmental policies and laws. Such delays will only contribute to further economic disruption and continuing unacceptable levels of unemployment. Lack of a comprehensive and balanced policy would allow one objective to go forward at the expense of other critical national goals.

It may be that additional Government standards will be required in future years. This is something which EPA and other Government agencies will work on in cooperation with the appropriate committees of Congress.

Today we cannot shirk our responsibility to make decisions that establish realistic ground rules. We cannot afford to ignore the sulfuric acid problem. But our response must be more than simply another Government decree that sets another standard that could create another problem. We have a positive obligation to ensure that the steps we take today do not aggravate potentially serious health hazards.

Other technical information was brought to my attention as I reached my automobile emissions decision. In addition to a statement of facts, which I am making public today, I have asked my advisers to consult with the appropriate members of the Congress, particularly the committees now considering legislation in this field. They will be available to discuss these complex and interrelated issues and to provide all the detailed information available to the executive branch.

I urge the Congress to carefully consider all the issues involved in the potential conflict that one national objective -- clean air -- might have on our efforts to reach other national goals.

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THE WHITE HOUSE
WASHINGTON

June 28, 1975

1) Mr. Brubaker
2) Mike Duval

74.1, file

[Handwritten signature]

MEMORANDUM FOR:

FRANK ZARB
JIM CANNON
JIM LYNN

[Handwritten initials]

FROM:

MAX FRIEDERSDORF

SUBJECT:

Congressional Reaction to Auto Emission Statement

I am sending along to you a report on the House and Senate reactions picked up by the staff Friday during our prenotification on the auto emission statement.

cc: Jack Marsh



THE WHITE HOUSE
WASHINGTON

June 27, 1975

MEMORANDUM FOR: MAX FRIEDERSDORF

FROM: WILLIAM KENDALL *WK*
PATRICK O'DONNELL *POD*

SUBJECT: Auto Emissions



Notifications and remarks re President's message of this date on auto emissions:

<u>Senator</u>	<u>Contact</u>	<u>Remarks</u>
Buckley	POD	Have my own plan with Senator Muskie, but think it will be helpful to have President on record with a current position
Baker	POD	Out of town and unavailable. Left information with Baily Guard, Minority Counsel to Public Works Committee
Stafford	POD	Believe the Muskie/Buckley compromise will be much more acceptable to Public Works Committee and praises Buckley for getting Muskie to back down as far as he has.
Domenici	POD	Good! Muskie compromise will not work; its emphasis is entirely too far towards imports. President's five year approach won't sell in committee but he will push for 3 years which is as far as we can realistically look.

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<u>Senator</u>	<u>Contact</u>	<u>Remarks</u>
Griffin	POD	Happy the President is going public anew on the issue. His personal involvement will be a great help.
Randolph	POD	I have to work with my committee members but will try to be of assistance.
Muskie	POD	I understand that President felt compelled to make his most recent position known. However, I think our (Buckley/Muskie) version will be more acceptable in long run. We'll have to see how it works out.
McClure	POD	Many thanks. Needs message A.S.A.P.
R. Byrd	BK	No comment. Looks forward to message
H. Scott	BK	Ken Davis asked if legislation would be required
Mansfield	BK	Thank you. Does Muskie know?



THE WHITE HOUSE
WASHINGTON



Rep. Paul G. Rogers - D. - Fla., Washington, D.C.

Contact: Chairman Rogers

Comments: Thanked us for the advance notice. Indicated neither support nor opposition to the President's statement.

Rep. Clarence J. Brown, R. - Ohio, District office in Springfield, Ohio

Contact: Congressman Brown

Comments: Appreciated advance notice. Asked that the President's statement and the Energy Resources Council memorandum be delivered to his office.

Rep. James T. Broyhill, R. - N.C., Within District

Contact: Congressman Broyhill

Comments: Recognizes the President's statement embodies a major shift in the Administration's position on auto emission standards. The Congressman is interested in acquiring all available background material and wants to be a sponsor of the Administration's legislation referred to in the Presidential statement.

Rep. John D. Dingell, D. - Mich., Washington, D.C.

Contact: Chairman Dingell

Comments: Chairman Dingell believes that the President's modification calling for a current extension is very wise. However, he did state that it was his opinion that Congress would not grant a 5-year extension, but rather would more likely adopt an extension of approximately three years. In addition, Mr. Dingell said he felt there would be some congressional criticism of the President's statement. This criticism was addressed the fact that the 5-year extension would neglect severe environmental concerns. Mr. Dingell hastened to add that he would not be critical of the President's announced statement.

Rep. H. J. Heinz, R. - Pa., Washington, D.C.

Contact: Warren Eisenberg, Administrative Assistant

Comments: Congressman Heinz is in Pittsburgh, Pennsylvania and was not where he could be immediately contacted. His AA was briefed and was told if the Congressman had any questions we would be available to respond throughout the course of the day.

Rep. James F. Hastings, R. -N.Y., Lake George, New York
Contact: Ms. Clare Bradley, Executive Secretary
Comments: Informed Ms. Bradley of the Presidential statement.
She will be seeing Congressman Hastings during the early afternoon
and will inform him of the contents in the President's statement.
If the congressman has any questions he will contact us.

Samuel L. Devine, R. -Ohio, Columbus, Ohio
Contact: Congressman Devine
Comments: Thanks for the information.



Rep. Tim Lee Carter, R. -Ky., Home in Kentucky
Contact: Congressman Carter
Comments: Congressman Carter said that as ranking member in the
House Health and Environment Subcommittee of the House Interstate
and Foreign Commerce Committee, he supported the President's
statement. He appreciated advance notice.

Speaker Carl Albert, D - Okla.) - out of town
Contact: Joel Jankowsky in Speaker's Office.
Comments: No need to contact the Speaker directly as he is out of town.
Mike Reed and Joel Jankowsky will advise him.

Rep. Bob Michel, R-Ill., in his Washington, D.C. office
Contact: Rep. Michel and his aides.
Comments: Nothing in there for burning of coal, etc. by industries. Has
no real problem with the extension of auto emission standards but strongly
recommends that some action be taken immediately on the problem of
industries burning of coal as it is a violation of the clean air act.

Rep. John McFall, D- Calif., in the Majority Whip's office
Contact: Spoke directly with Rep. McFall
Comments: All for it -- standards are too tight. For cleaning up the
environment but we are going too far on the environmental side. Don't care
what Ralph Nader says. We need to give the auto manufacturers some room
to maneuver to obtain greater fuel efficiency.

Rep. Barber Conable, (R-NY)

Contact: Harry Nicholas, AA to Rep. Conable

Comments: Will pass the information on to Rep. Conable. Conable is travelling to speaking engagement. Will tell Conable when he calls into the office.

Rep. Tip O'Neill, (D - Mass.)

Contact: Home of Gary Hymel

Comments: Not a matter to try and contact Rep. O'Neill on, as he is out of town. Tip will be all for it. Consider notice to Hymel as notice to Tip.

Rep. John Anderson, (R - Ill.)

Contact: At Rep. Anderson's home

Comments: Wanted to know the basis for the change in position and explained that the President's energy program had recommended different auto emission standards through 1980. Because of the health problems associated with the catalytic converter and the need for greater fuel efficiencies and how they are achieved it was decided to extend present auto emission standards. Wanted to know if this would take legislation and told him that it would.

Rep. Harley Staggers, (D - W. Va.)

Contact: Talked to Marguerite Furfari in Congressional Office (A.A to Staggers)

Comments: Rep. Staggers at a speaking engagement and will be given the information when he calls in.



Rep. John Rhodes. (R - Ariz)

Contact: Congressional Office - Dennis Taylor's sec'y, Joanne

Comments: No comments. She will inform Dennis Taylor who will notify Mr. Rhodes.

