

US EPA ARCHIVE DOCUMENT

APPENDIX B

Draft Colorado SIP Revision

INTRODUCTION

Colorado is submitting this SIP revision to EPA as a substitute for the clean-fuel vehicle program prescribed by section 246 of the Clean Air Act, 42 U.S.C. § 7586, for the Denver carbon monoxide (CO) nonattainment area. The submittal of a substitute program is authorized by section 182(c)(4)(B) of the Clean Air Act, 42 U.S.C. § 7511a(c)(4)(B).¹ Under this provision, EPA will approve such a substitute SIP revision if it will achieve long-term reductions in CO and toxic air emissions equal to those that would be achieved under part C of title II of the Clean Air Act.

The requirements described below will achieve long-term reductions in CO and toxic air emissions in the Denver CO nonattainment area equal to those that would be achieved under a clean-fuel vehicle program for the area meeting the requirements of part C of title II of the Clean Air Act.

BACKGROUND

As part of a project under the Colorado Environmental Leadership Program and the EPA Project XL Program, the United States Postal Service (USPS) has proposed to eliminate from the Denver CO nonattainment area, either through destruction or relocation, 794 delivery vehicles, and to replace them with lower-emitting flexible fuel vehicles that the USPS has contracted with Ford Motor Company to produce and deliver (hereinafter referred to as new FFVs). Also, the USPS has voluntarily agreed to meet certain other requirements to maintain the emissions reductions that will result from the destruction and relocation of the 794 delivery vehicles. With the USPS's consent, the State of Colorado is using the USPS's actions, and requirements the USPS has agreed to, as a substitute for the federally required clean-fuel vehicle program for the Denver CO nonattainment area. In order to qualify as a substitute program, these requirements must be made enforceable through a SIP revision approved by EPA. The USPS has consented to this approach (see the Final Project Agreement for U.S. Postal Service - Colorado Environmental Leadership Program and Project XL, dated _____ (FPA).)

¹Section 182(c)(4)(B) of the Act refers to ozone-producing emissions; however, EPA has interpreted this section to allow for substitute programs for CO as well.

USPS REQUIREMENTS

Pursuant to this SIP revision, the USPS shall meet the following requirements:

1. The USPS shall destroy² 512 pre-1984 model year USPS vehicles that the USPS currently has in service in the Denver CO nonattainment area. Also, the USPS shall relocate 282 Long-Life Vehicles (1987-1991 model year USPS delivery vehicles) that the USPS currently has in service in the Denver CO nonattainment area. The vehicles to be relocated will be moved to other western cities and will replace older, higher emitting vehicles. The USPS shall meet the following schedule for vehicle destruction and relocation:
 - a. Within 120 days of Ford's delivery of each of the 794 new FFVs, the USPS shall destroy one of such pre-1984 USPS vehicles or relocate one of such Long-Life Vehicles.
 - b. Notwithstanding the foregoing, by July 31, 2001, the USPS shall destroy all 512 of such pre-1984 USPS vehicles and relocate all 282 of such Long-Life Vehicles.
2. The USPS shall only replace delivery vehicles that are part of its light-duty delivery fleet within the Denver CO nonattainment area with new light-duty delivery vehicles that meet applicable EPA emissions standards.
3. If the USPS increases the size of its light-duty delivery fleet within the Denver CO nonattainment area, the USPS shall only add new light-duty delivery vehicles that meet applicable EPA emissions standards.
4. Within 30 days of the date the USPS signs the FPA, the USPS shall provide to CDPHE a list of the postal service vehicles that will be destroyed, and those that will be relocated, pursuant to this SIP revision. The list shall include Vehicle Identification Numbers (VINs) for vehicles to be destroyed, VINs or equivalent identifiers for vehicles to be relocated, vehicle makes and models, vehicle model years, and location where each vehicle is stationed.
5. Beginning March 31, 2000, and every three months thereafter, through December 31, 2001, the USPS shall provide CDPHE with a report, signed by the USPS District Manager for

²For the purposes of this SIP revision, destruction requires that the USPS destroy the pre-1984 vehicles without compensation (except for scrap metal value), removing the battery (if desired), the catalytic converter (if desired), and any parts that must be removed by law. No other parts of the vehicle may be removed prior to destruction.

Colorado/Wyoming certifying the report's accuracy, that includes the following information:

- a. Number of new FFVs delivered in the reporting period (the three month period ending one month before the report due date) along with the cumulative total of new FFVs delivered in the Denver CO nonattainment area.
- b. Date each new FFV was delivered during the reporting period.
- c. How USPS intends to scrap the vehicles as set forth in footnote 2 above.
- d. Number, make, model, VIN, model year, and emission levels of each vehicle destroyed pursuant to paragraph 1, above, during the reporting period, along with the date of destruction.
- e. For each vehicle destroyed during the reporting period pursuant to paragraph 1, above, the USPS shall provide the relevant PS Form 4587 - Request to Repair, Replace, or Dispose of a Postal-Owned Vehicle. The USPS shall also certify that each of the vehicles has been destroyed and that each of the destroyed vehicles was in service in the Denver carbon monoxide nonattainment area immediately prior to destruction.
- f. Cumulative number of vehicles destroyed pursuant to paragraph 1, above, through the end of the reporting period.
- g. Number, make, model, VIN or equivalent identifier, and model year of each vehicle relocated pursuant to paragraph 1, above, during the reporting period, along with the date of relocation.
- h. For each vehicle relocated pursuant to paragraph 1, above, during the reporting period, the USPS shall provide the bill of lading. The USPS shall also certify that each of the relocated vehicles was in service in the Denver carbon monoxide nonattainment area immediately prior to relocation, and certify that each of the vehicles was relocated to an area outside the Denver carbon monoxide nonattainment area, providing the vehicles' final destination.
- i. Cumulative number of vehicles relocated pursuant to paragraph 1, above, through the end of the reporting period.
- j. Number, make, model, VIN or equivalent identifier, model year, and emissions certification (or if there is no emissions certification, an estimate of the CO and VOC emissions) of each light-duty delivery vehicle the USPS has replaced within the Denver CO nonattainment area during the reporting period (other than vehicles replaced

pursuant to paragraph 1, above), along with a description of the disposition of the replaced vehicle. For each vehicle replaced, the report must identify the corresponding replacement vehicle, including make, model, model year, VIN or equivalent identifier, and emissions certification.

- k. Number, make, model, model year, VIN or equivalent identifier, and emissions certification of each vehicle added to the light-duty delivery fleet within the Denver CO nonattainment area during the reporting period. This subparagraph refers only to vehicles that are added that increase the overall size of the light-duty delivery fleet.
 - l. Anticipated schedule for delivery of remaining new FFVs.
 - m. Anticipated schedule for destruction and relocation of additional vehicles under paragraph 1, above. The schedule shall include times, dates, and locations for destruction and CDPHE will monitor the destruction of the vehicles.
6. After December 31, 2001, the USPS shall submit the report described in paragraph 5 on an annual basis, by December 31 of each year, through December 31, 2004, and the reporting period shall be the 12 month period ending November 30 of each year.

USPS CONSENT

The USPS consents to the incorporation of this document into the federally enforceable SIP and understands that, once incorporated into the SIP, this document will be enforceable pursuant to the federal Clean Air Act.