

**Comments of Urban Air Initiative Regarding the Reclassification of the Denver Area for the 2008 Ozone National Ambient Air Quality Standard****EPA Docket ID EPA-R08-OAR-2019-0354-0001****September 13, 2019**

Urban Air Initiative Inc. (UAI) is a registered 501 (c) (4) non-profit technical and educational social welfare organization with significant technical expertise in the fields of fuels, emissions, auto technology, and air pollution. UAI respectfully urges EPA to move forward carefully in EPA's efforts to reclassify the Denver Area as Serious Non-Attainment in regards to ozone emissions. Any actions to change gasoline fuel properties in the Denver Area with the use of EPA's Motor Vehicle Emission Simulator Model (MOVES Model) will have negative impacts on Denver's air quality due to significant errors within the Model itself.

Specifically, the MOVES Model, which is the basis for modeling current mobile source emissions or implementing future changes to fuel properties in an effort to reduce emissions, is flawed in a number of ways, the specifics of which are presented in detail in previous comments UAI provided EPA on January 19, 2017 (*See* Docket ID Nos. EPA-420-R-13-002; FRL-9917-26-OAR). Those comments are attached, and we ask that UAI's prior written comments be included in the record of comments for this docket. It is important to note the States of Kansas and Nebraska are co-petitioners to those comments.

The EPA EPAAct/V2/E-89 Fuel Effects Study used to construct the MOVES Model is not "accurate, reliable, and unbiased," as required, and its flawed design thwarted its intended purpose of "predicting emissions for the majority of in-use fuels."

We note that the fuel blending used in the construction of the MOVES Model for both tailpipe and evaporative emissions is not based on real world fuel properties. In fact, blending of the test fuels was done in a manner completely opposite of what oil refineries actually do when formulating gasoline. Consequently, the embedded defaults in the Model do not represent real world fuels, and inaccurately blame the presence of ethanol for various emission increases.

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The reality is that ethanol has been proven to provide a wide range of benefits, and improves gasoline quality through the replacement and dilution of harmful aromatic hydrocarbons used by oil refineries to increase octane. Ethanol not only reduces CO and toxic emissions such as benzene and Polycyclic Aromatic Hydrocarbons (PAH) emissions, but also reduces the precursors to Secondary Organic Aerosols (SOA), PM2.5 and ozone. Responsible modeling methods should not just focus on reduced ozone emissions, but should also address precursors that are scientifically proven to have a real world negative impact on human health.

EPA has, through correspondence, internal emails, and public presentations, acknowledged flaws in both the EPA Act Study and the MOVES Model. It is in the interest of the Agency, the state, the public, and industry to work together to make the Models as scientifically accurate as possible.

EPA has the necessary administrative discretion to limit the use of the MOVES Model until such time that this Model is corrected to address the known discrepancies related to gasoline fuel properties and false emission rates. No fuel properties should be changed and/or new formulations adopted until this correction occurs. Further, the proposed reclassification of the Denver Area as “Serious Non-Attainment” should be suspended until the Model is corrected, with the corrected Model then properly applied to evaluate the Denver Area’s compliance.

Respectfully,

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Technical Director  
Urban Air Initiative