

Revision to Environmental and Economic Impact Statement for the 1978 Evaporative Emission Regulations

Mobile Source Air Pollution Control
Office of Air and Waste Management
U.S. Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE September 2, 1976

SUBJECT Revision to Environmental and Economic Impact
Statement for the 1978 Evaporative Emission Regulations

FROM Tom Rarick, SDSB *Tom Rarick*

TO Charles Gray, Chief, SDSB

This memo is an update to the "Final Environmental and Inflationary Impact Statement" written in support of the 1978 Evaporative Emission Regulations (published in the Federal Register on Aug. 23, 1976 p. 35626). In the Final Impact Statement the cost of control was calculated as the cost to improve the current evaporative control systems to meet a 6 g/test standard as measured by the enclosure test procedure. Light Duty Trucks (LDTs) between 6,000 and 8,500 lbs. will not be required to have any evaporative control system until 1979 (provided the LDT regulatory action changing the definition of LDTs to include trucks between 6,000 and 8,500 lbs. is promulgated for 1979). In 1979 trucks between 6,000 and 8,500 lbs. will be required to meet a 6 g/test standard, but the cost of control will be greater than for vehicles weighing less than 6,000 lbs. due to a required investment for a basic control system similar to those already used on vehicles below 6,000 lbs. The cost of that basic system was not included in the final impact statement.

The retail cost range of a current evaporative control system has been estimated to be \$7 to \$9*. For this analysis a retail value of \$9 will be used.

The impact of the \$9 cost on the salesweighted cost of control can be calculated by multiplying it times the ratio of trucks between 6000 and 8500 lbs to the total number of vehicles affected (all LDVs plus trucks below 8500 lbs.). In the final impact statement, it was assumed that trucks below 8500 lbs. represented 20% of all vehicles affected (LDVs plus LDTs). Trucks between 6000 and 8500 lbs. represent 33%** of all trucks below 8500 lbs. Therefore, 6.7% of all vehicles affected are 6,000 to 8,500 lb. trucks. The increased sales weighted cost above that reported in the final impact statement (\$7.30) would then be:

$$(\$9) (.067) = \$.60$$

or an 8% increase.

*"Automobile Emission Control - The Current Status and Development Trends as of March 1976", Prepared by Technology Assessment and Evaluation Branch, ECTD, MSAPC, EPA, April 1976, p. 4-19.

**In-house memo from Marcia Williams, Assistant to the Director, ECTD, to the Record, December 4, 1975.

The \$.60 increase in cost is small compared with the range of uncertainty of the actual costs. In the final impact statement it was stated that \$7.30 represented a maximum expected cost to the consumer, but that the actual increased cost to the consumer could be as low as \$2. Because the \$.60 increase is small compared with the range of expected costs, further re-calculation of other cost related values (such as cost effectiveness) would not be very meaningful, and therefore, is not included here.