PM Mass-Based Standard for Achieving PM Emissions Commensurate with Model Year 2022 GPF Technology for Light-Duty and Medium-Duty Vehicles



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EPA Proposed Rulemaking

April 2023, EPA proposed multipollutant emissions standards (criteria pollutants and GHG)

Light-duty and medium-duty vehicles; $GVWR \le 14,000$ lb (6350 kg)

Applies to MY 2027 – 2032

Performance-based, inter-dependent, synergistic

Public comment period through July 5, 2023, plans for final rule by March 31, 2024

Criteria pollutant fleet phase-in

	GVWR ≤ 6000 lb	6001 – 8500 lb		8501 – 14,000 lb	
		default*	early**	default*	early**
2027	40%	0%	40%	0%	40%
2028	80%	0%	80%	0%	80%
2029	100%	0%	100%	0%	100%
2030-2032	100%	100%	100%	100%	100%

* Default phase-in provides 4 years lead time as required by CAA

** Incentives for choosing early phase-in (e.g., carry forward NMOG+NO_x credits)



Light-Duty Vehicle Standards (LDV, LDT, MDPV)

NMOG+NOx standards

- $30 \rightarrow 12 \text{ mg/mi}$ fleet average standard, BEVs included (60% reduction)
- Same standard over 4 cycles: 25°C FTP, HFET, US06, SC03
- Eliminates higher bins (no high emitters) and adds lower bins
- -7°C fleet average standard: NMHC \rightarrow NMOG+NO_x; 300 mg/mi; BEVs not included so fleet average doesn't decline
- New engine start-up standards: PHEV high power starts (cold start US06), early driveaway (in gear at 6 seconds), intermediate soak (10 min, 40 min, 3-12 hr)

<u>PM</u>

0.5 mg/mi (0.3 mg/km) per vehicle standard (cap) for -7°C FTP, 25°C FTP, US06 (from na/3/6 mg/mi)

<u>CO</u>

1.7 g/mi per vehicle standard (cap) for 25°C FTP, HFET, US06, SC03 10.0 g/mi per vehicle standard (cap) for -7°C FTP

<u>HCHO</u>

4 mg/mi per vehicle standard (cap) for 25°C FTP

Elimination of the allowance for the use of commanded enrichment for power or component protection



Medium-Duty Vehicle Standards (Class 2b and Class 3)

NMOG+NOx standards

- $178/247 \rightarrow 60$ mg/mi fleet average standard, BEVs included (66-76% reduction)
- Same standard over 4 cycles: 25°C FTP, HFET, US06, SC03
- Eliminates higher bins (no high emitters) and adds lower bins
- New -7°C fleet average standard: NMOG+NO_x; 300 mg/mi; BEVs not included in fleet average so fleet average doesn't decline

<u>PM</u>

0.5 mg/mi (0.3 mg/km) per vehicle standard (cap) for -7°C FTP, 25°C FTP, US06 (from 8/10 mg/mi in FTP and 10/7 mg/mi in HD-SFTP for class 2b/3)

<u>CO</u>

3.2 g/mi per vehicle standard (cap) for 25°C FTP, HFET, US06, SC03 New 10.0 g/mi per vehicle standard (cap) for -7°C FTP

<u>HCHO</u>

6 mg/mi per vehicle standard (cap) for 25°C FTP

Elimination of the allowance for the use of commanded enrichment for power or component protection

MDV with GCWR > 22,000 lb comply with HD engine-dynamometer-based criteria pollutant standards



PM Standards

Euro 7 Proposal

EPA 2027+ Proposal	Euro 7 Proposal				
Measurement ()					
PM <u>mass</u> (mg/mi)	<u>Solid PN (</u> #/km)				
Includes solid and <u>semi-volatile</u> PM	Excellent sensitivity at low PN				
Health benefits quantifiable by PM2.5 epi studies	Addresses nanoparticles with very low mass (toxicology studies)				
Test Cycles					
-7°C FTP	WLTC				
25°C FTP	RDE normal conditions (0 to 35°C,)				
US06	RDE extended conditions (-10 to 40°C,)				
	RDE budget for <10 km trips				
Standards					
0.5 mg/mi for all cycles	6x10 ¹¹ #/km in WLTC and RDE normal conditions, >10 nm				
~6x10 ¹¹ #/km >23 nm (SAE 2019-01-0314)	9.6x10 ¹¹ #/km in RDE extended conditions, >10 nm				
	6x10 ¹² #/trip budget for <10 km trips, >10 nm				
Stringency					
Significant stringency during -7°C cold start (high engine-out	More stringent wrt nanoparticles, especially in moving to >10 nm				
PM), high load (passive regen), and enrichment (semi-volatile PM)	Significant stringency during RDE extended conditions: low temperature (-10°C) high speeds (160 km/h), high max ave power <2 km after cold start, and towing				



Purpose of PM Test Cycles

-7°C FTP

-7°C important real-world temperature (addresses uncontrolled cold PM in Tier 3) Differentiates vehicles with GPF-level PM from vehicles with Tier 3 levels of PM

<u>25°C FTP</u>

Standards at 25°C and -7°C ensure clean vehicle operation over a range of temps

<u>US06</u>

High load real-world driving

Ensures good PM control during and immediately after GPF regeneration by inducing on-cycle passive GPF regeneration Max GPF Inlet Temperature F150, underfloor GPF





Selected Elements of PM Mass Test Procedures (CFR Part 86, 1065, 1066)

Critical elements

- Pure PTFE membrane filters (Part 1065.170)
 - Less gas-phase artifact than borosilicate fibers reinforced with woven glass cloth and bonded with PTFE

Static charge removal using an α -emitter (Part 1065.190)

• e.g., five 500 µCi strips of ²¹⁰Po placed around filter on microbalance

Increase PM signal-to-noise ratio

Use lower half of allowable dilution factor range (7-20) (Part 1066.110)

Increase FFV from 90 \rightarrow 140 cm/s (Part 1066.110). Improves signal-to-noise ratio^{1,2}

Load 1 filter/test (not 1 filter/phase) (Part 1066.815). Improves signal-to-noise ratio^{1,2}

Xue, Durbin, Kittelson, et al., 2018, Journal of Aerosol Science, 117, 1-10.
CRC E-99

Other important considerations

Temperature, dewpoint, grounding, HEPA-filtered dilution air, filter handling (Part 1065.140/190)

Coarse particle separator (removes >50% of PM10 and <1% of PM1 at sampling conditions) (Part 1065.145)

Robotic auto-handler weighing (Part 1065.190)

Background correction ≤ 5ug or 5% of std (Part 1066.110)



Laboratories, Vehicles, GPFs





close-coupled



underfloor



underfloor



Overview of PM Data across -7°C FTP, 25°C FTP, US06 Test Cycles



GPF results are conservative because

- 1) Data not background corrected
- 2) GPF tests performed with little or no stored soot (unloaded GPF)
- 3) GPF technology will improve further between now and 2027

- ✤ Large gap between non-GPF and GPF-equipped vehicles in -7°C FTP (high engine-out PM)
- MY2022 GPFs performed significantly better than MY2019 GPFs in US06 (GPF regeneration) and easily meet the proposed 0.5 mg/mi standard



Light-Duty Vehicle (MY2021 F150 HEV) with MY2022 GPF



GPF PM measurements shows some lab-to-lab bias exists (also reflected in tunnel blanks), but GPF PM results including lab-to-lab bias and test-to-test variability easily comply with the proposed 0.5 mg/mi standard.



Medium-Duty Vehicle (MY2022 F250) with MY2022 GPFs



- ✤ GPF is equally effective on medium-duty vehicle as on light-duty vehicle.
- ✤ GPF PM results, including test-to-test variability, easily comply with the proposed 0.5 mg/mi standard.



Summary

- Existing Part 86/1065/1066 procedures afford low lab-to-lab bias and low test-to-test variability, and can be used to require PM emissions commensurate with model year 2022 GPF technology
- ✤ -7°C FTP differentiates non-GPF and GPF-equipped vehicles.
- MY2022 GPFs demonstrate high filtration across three cycles and three testing organizations and perform significantly better than MY2019 GPFs in the US06.



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