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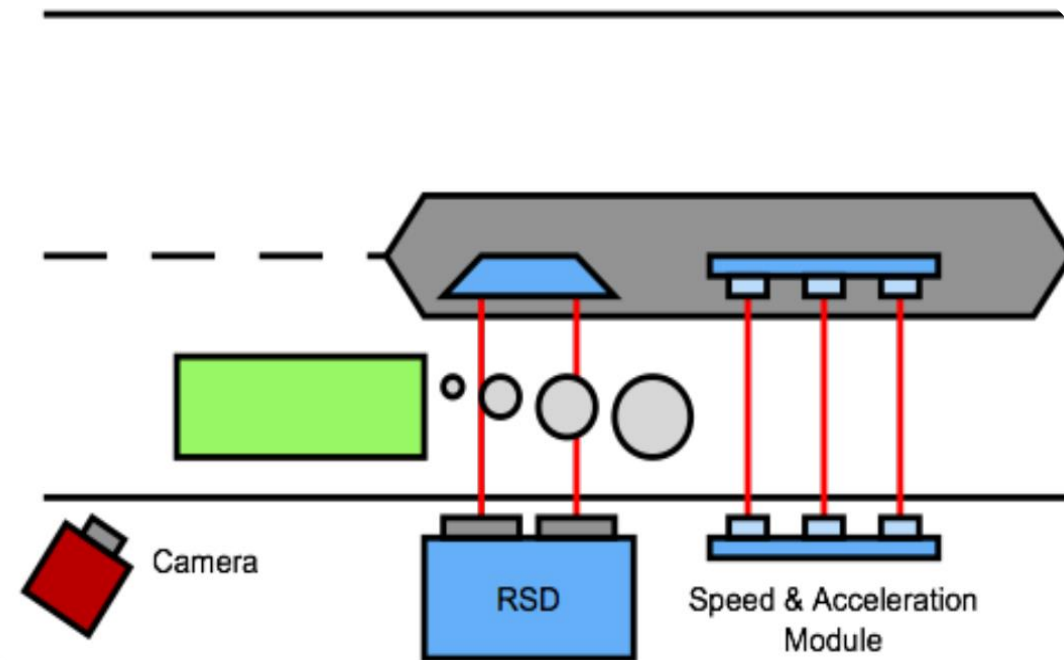
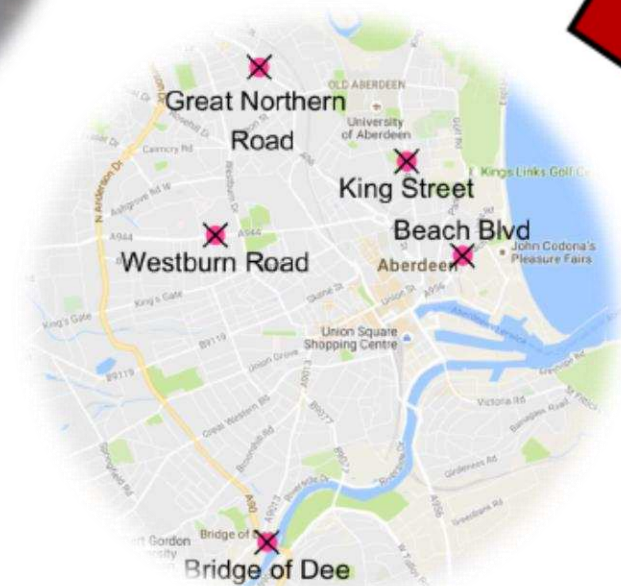
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1 A novel method for comparing passenger
2 car fleets and identifying high-chance
3 gross emitting vehicles using kerbside
4 remote sensing data
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***Highlights (for review : 3 to 5 bullet points (maximum 85 characters including spaces per bullet point)**

- A large number of real driving emission measurements were performed including newly type-approved Euro 6 diesel and petrol passenger vehicles.
- A statistical method was developed for identifying gross-emitter candidate vehicles.
- Under appropriate circumstances it may be appropriate to recommend further investigation to diagnose the cause of these gross-emitter characteristics.

1 A novel method for comparing passenger car fleets and
2 identifying high-chance gross emitting vehicles using
3 kerbside remote sensing data

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6 *9JT*

7 **Abstract**

8 . The quantification and comparison of NO_X emission from in-situ car fleets,
9 and identification of the highest emitters is an ongoing challenge. This chal-
10 lenge will become more important as new and increasingly complex emis-
11 sions removal systems penetrate the market. We combine real-world data
12 with new-to-the-field statistical methods to describe fleet-scale emissions be-
13 haviours and identify candidate gross-emitter vehicles.

14 . 19605 passenger cars were observed using a Remote Sensing Device across
15 Aberdeen in 2015. Of these, 736 were Euro 6 Passenger Cars. The distri-
16 bution of observed pollutant per unit of fuel burnt ratios for most fuel type
17 and Euro standards followed an asymmetrical shape best characterised by
18 the Gumbel distribution. The Gumbel distribution approach was not able
19 to fully replicate the distribution of measurements of petrol or Euro 6 diesel
20 cars due to the presence of a subset of high-emitting outliers, ranging from
21 the 13th percentile for Euro 3 petrol to the 2nd percentile for Euro 6 petrol,
22 with Euro 6 diesel having a 5th percentile outlier value. No outlier fraction
23 was observed for pre-Euro 6 diesels.

. The off-model fractions resembled Gumbel distributed data and in some cases could be modelled as a separate distribution with the fleet behaving as a superposition of them. It is shown that VSP was not directly linked to this behaviour and it is hypothesised that it is caused by the emissions control systems operating sub-optimally. The reasons for sub-optimal operation are beyond the scope of this paper but may be linked to air-fuel mixture sensors, cold-start running and deterioration of the catalytic converter. Larger data-sets with more Euro 6 passenger cars are required to fully test this. Application of this methodology to larger data sets from more widely deployed remote sensing devices will allow observers to identify potentially problematic vehicles for further investigation into their emission control systems.

24 *Keywords:* NO_x, Vehicle Emissions, Remote Sensing, Real Driving
25 Emissions, Clean Air Zone

26 **1. Introduction**

27 *1.1. Background and Motivation*

28 . The oxides of nitrogen (typically nitric oxide and nitrogen dioxide, col-
29 lectively referred to as NO_x) have long been known as a major contributor
30 to poor health, with negative outcomes being a result of exposure in most
31 medical domains (EEA, 2017; COMEAP, 2015; Zhang and Batterman, 2013;
32 IARC, 2013; WHO, 2013; Kampa and Castanas, 2008; WHO, 2006). The
33 most significant contributor of NO_x to urban environments are mobile oil
34 powered sources, internal combustion driven vehicles (O’Driscoll et al., 2018;
35 Vojtíšek-Lom et al., 2018; Colvile et al., 2001). Attempts have been made
36 to limit the exposure of people to NO_X by stipulating ambient air pollution

37 concentration limit values and vehicle emission standards in the European
38 Union and elsewhere. The current ambient concentration values for NO_X
39 are $40\mu gm^{-3}$ annual average and not to exceed $200\mu gm^{-3}$ hourly average
40 concentration 18 times per year and are stipulated in the EU First Daughter
41 Directive (99/30/EC). The annual limit for hourly exceedance was reached
42 by January in 2018 at Brixton Road in London and Putney High Street broke
43 the exceedance more than 1200 times in 2016 (Guardian, 2018, 2016).

44 . Vehicle emission standards have been introduced in various stages since
45 1992, with the Euro 3 legislation in year 2000 first specifying a maximum
46 NO_X emission rate for cars. Significant reductions of NO_X have not been
47 seen in either the concentration in local air (Holman et al., 2015; Ellison
48 et al., 2013; Boogaard et al., 2012) or the real driving emissions performance
49 of vehicles prior to the Euro 6 legislation despite these interventions (Tate,
50 2016, 2013a,b; Chen and Borcken-Kleefeld, 2014; Carslaw and Rhys-Tyler,
51 2013). Chassis dynamometer measurements made under strictly controlled
52 laboratory conditions have not been representative of the NO_X emissions
53 of in-situ vehicles. Real-world factors including engine management settings,
54 vehicle age, payload, ambient and operating temperature, tyre pressure, road
55 gradient (Wyatt et al., 2014) and a range of other uncontrolled variables are
56 also considered to influence on-road emissions (Rushton et al., 2018; Rushton,
57 2016)

58 . Euro 6 is a new set of type approval legislation introduced in 2014 for pas-
59 senger cars. Euro 6 introduces stricter limit values on NO_X emission com-
60 pared to Euro 5 and below. A more stringent testing procedure, designed to

61 represent real driving, is to be introduced for later iterations of the legisla-
62 tion. Euro 6 legislation sets the NO_X emission rate at $0.08gkm^{-1}$, half the
63 Euro 5 limit value. Euro 6b report real driving emissions with no limit values
64 and Euro 6c introduces a new drive cycle in the World Harmonised Light Ve-
65 hicle Test Procedure (WLTP) (Demuynck et al., 2012; Sileghem et al., 2014).
66 Real driving emissions (RDE) rates are reported alongside a conformity fac-
67 tor (CF) with the onset of Euro 6d-temp in 2018 (Mock, 2017). The aim of
68 the more stringent test procedure is to make cycle beating, as observed in the
69 Volkswagen Group emissions scandal, more difficult to achieve. Some initial
70 tests on a small number of vehicles using Portable Emissions Measurement
71 Systems (PEMS) have been performed with results suggesting significantly
72 differing successes between different vehicles (O’Driscoll et al., 2016; Heijne
73 et al., 2016; Weiss et al., 2012, 2011). The impact this regulation will have
74 on real-world tailpipe NO_X emissions is not well understood.

75 . RDE NO_x testing using PEMS equipment was first approved for use on
76 heavy-duty vehicles in 2009 (EC 595/2009) and made mandatory for pre-sales
77 type approval in 2011 (EC 582/2011). RDE testing of heavy-duty vehicles
78 has been introduced (EC, 2015a,b) and to tighten the rules on in-fleet light-
79 duty vehicles (EC, 2017). These moves have been formalised in regulation EC
80 2016/427. The specification of the light-duty RDE test procedure requires
81 between 90 and 120 minutes of driving to be completed. Of this, between 29%
82 and 44% of the distance must be urban (6% to 30% stationary) and 23% to
83 43% of the distance must be both motorway and extra-urban. Average speeds
84 of $15kmh^{-1}$ to $40kmh^{-1}$ are required in the urban driving section, $60kmh^{-1}$
85 to $90kmh^{-1}$ in the extra-urban section and greater than $90kmh^{-1}$ in the

86 motorway section, with at least 5 minutes having an average speed greater
87 than $100kmh^{-1}$. Boundary conditions for the RDE test are dynamically set
88 based on average speed per section to ensure that the driving style is neither
89 too aggressive nor too passive (Commission Regulation (EU) 2016/646). The
90 relative positive acceleration ($RPA = \frac{1}{d} \sum_{i=1}^n \frac{a_i \times v_i}{3.6}$ for $a > 0$ and $RPA = 0$
91 for $a \leq 0$) (De Haan and Keller, 2004) must exceed the lower boundary
92 condition. The 95th percentile of the product of speed and acceleration ($v \times a$)
93 over the drive cycle must not exceed the upper boundary. The maximum
94 altitude change is limited to 1200m per 100km, an average gradient of just
95 over 1%. The vehicle mass (M) must satisfy the boundary condition $M \leq$
96 $M_{90\%}$ where $M_{90\%}$ is 90% of the vehicles maximum mass. (Mock, 2017).
97 Vehicles have to meet a Not To Exceed (NTE) limit defined as the product
98 of the Conformity Factor (CF) and the type approval limit. The CF value
99 is to be determined in EC 2016/427 but is stated as $CF = 2.1$ from 4 years
100 after the introduction of Euro 6 type approval limits, defined in EC 715/2007,
101 (Euro 6d-temp) decreasing to $CF = 1.0$ plus a margin of error in the PEMS
102 device (Euro 6d) of 0.5 in Mock (2017) report and regulation EC 2016/646.

103 . The inclusion of RDE in the type approval process represents a step change
104 in thinking and process for reducing the emissions from new diesel-powered
105 vehicles. The RDE test may solve many of the issues arising from high NO_X
106 and primary NO_2 emissions in urban environments from passenger cars (De-
107 graeuwe et al., 2016). Real-world monitoring of in-situ fleet vehicles and
108 a robust methodology for comparing both individual vehicles and classes of
109 vehicles is required to validate the benefit of the new legislation. Kerbside re-
110 mote sensing devices allow for indirect and unobtrusive inspection of vehicles

111 subject to real duty cycles and driven by real drivers in a naturalistic way,
112 with minimal disruption to infrastructure. Short-term surveys (Section 2.1)
113 have laid the ground work for scientific enquiry, however the knowledge con-
114 tained within these data is yet to be fully discovered. The analysis techniques
115 presented and demonstrated in this paper intend to extend the knowledge
116 and understanding that can be gleaned from remote sensing measurements.

117 **2. Materials and Methodology**

118 *2.1. Data Collection*

119 . Remote Sensing Devices (RSDs) have been used in studies across the UK,
120 Europe and world-wide to assess the emissions of in-situ vehicles for a number
121 of years. These studies have shown that there has been little to no change
122 in NO_X emissions from Euro 3 to Euro 5 diesel powered PCs, light com-
123 mercial and heavy commercial vehicles, despite the incrementally increasing
124 strictness of type approval limit values (Rushton et al., 2018; Carslaw and
125 Rhys-Tyler, 2013; Tate, 2013a,b; Carslaw et al., 2011b,a; Bishop et al., 2003,
126 2001; Bishop and Stedman, 1996, 1990).

127 . The RSD was initially developed in 1989 as part of the United States clean
128 air programme (EPA, 1999) to measure Carbon Monoxide (CO) (Bishop
129 et al., 1989) and has been developed further to include Hydrocarbons (HC)
130 (Popp et al., 1999) and NO with prototype Fuel Efficiency Automobile Test
131 (FEAT) devices able to record Ammonia (NH_3) and NO_2 (Burgard et al.,
132 2006). Measurements of the abundance of these species are made by infra-red
133 (IR) and ultraviolet (UV) photometry at frequencies where the species are
134 known to have absorption lines (Bishop et al., 1996). The RSD instrument

135 consists of an open-path non-dispersive IR and dispersive UV light sources
136 tuned to frequencies that interact with NO and CO_2 molecules in the exhaust
137 plume to report a ratio between NO and CO_2 . To take a measurement the
138 source and detector module (SDM) directs a multi-frequency beam of light
139 across a single lane of traffic which is reflected back using a corner cube
140 mirror. The SDM calculates the difference in intensity between the sent (I_0)
141 and the received (I) beam. The difference in intensity varies in accordance
142 with the Beer-Lambert law (Lambert, 1760), ($I = I_0 \times e^{-\tau\nu}$) where $\tau\nu$ is the
143 optical depth of the material at frequency ν . The instrument returns the ratio
144 of emissions between CO_2 and NO . The instrument is constantly operating
145 and the pollution background level, subtracted from the observed tailpipe
146 emission, is calculated using the last measurements before the beam is broken.
147 The remaining difference is appointed to the vehicle. Measurement of NO
148 and NO_2 is especially problematic as there are other species with strong
149 absorption lines at similar frequencies to those used to measure NO_2 and have
150 a high potential for interference. The most noticeable source of interference in
151 NO_2 measurements is water (H_2O). Water vapour in the plume, a byproduct
152 of combustion, and also present in the atmosphere, can cause interference.
153 The high spectral resolution of the RSD4600 and RSD5000 instruments allow
154 the impact of interference to be minimised (Jimenez-Palacios, 1998).

155 . The RSD was deployed for ten days across five sites in the summer of 2015.
156 It was deployed for two days per site and the sites were distributed around
157 central Aberdeen (Tate, 2016). Aberdeen is a port city in East Scotland with
158 a modern economy including research and development into technology and
159 agriculture, and oil due to its proximity to the North Sea. The sites used



Figure 1: Location of RSD sites in Aberdeen

160 for data collection are identified geographically in Figure 1. The observation
 161 sites were pre-selected to represent a range of arterial, circulatory and city
 162 centre streets, whilst also meeting practical accessibility constraints such as
 163 obstruction of the roads and footpaths. The RSD was deployed from 08:00
 164 to 18:00 where possible to capture the AM, PM, and inter peak periods,
 165 and to maximise the sample size of vehicles observed. The number of PC
 166 observations per vehicle category are presented in Table 1.

167 . The RSD was set up in a standard on-road configuration as described in
 168 the user manual provided with the equipment (ESP, 2005). An in-depth
 169 description of the setup including survey site photographs can be found in
 170 Rushton (2016) and Tate (2016). The locations of the sites in Aberdeen
 171 are identified in Figure 1. The camera could be placed facing the front or

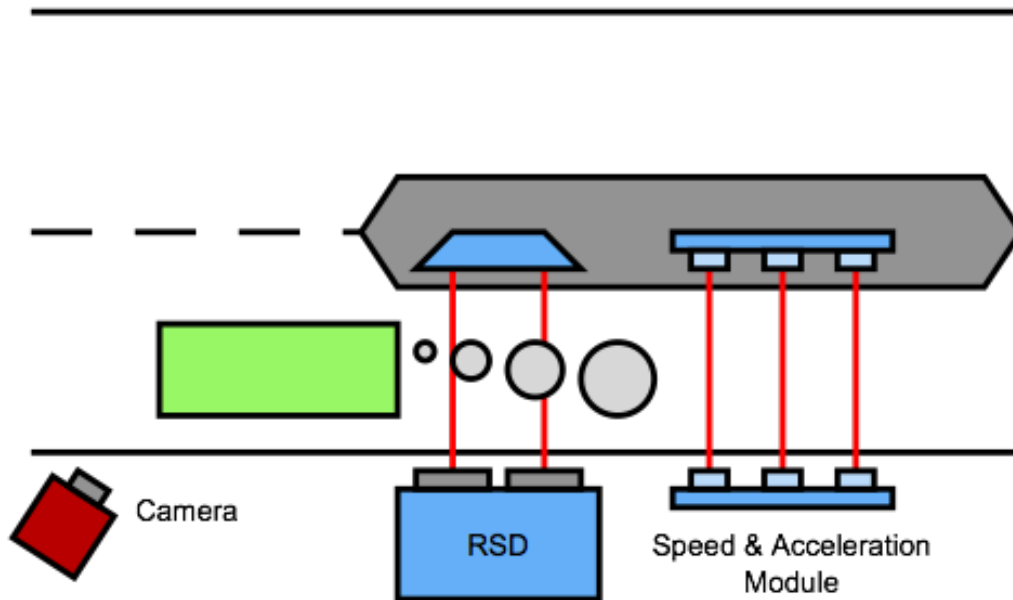


Figure 2: Generalised remote sensing installation schematic with camera facing the front of the vehicle

172 rear of the vehicle. Figure 2 shows the instrumentation in front facing in
 173 the configuration. Front facing cameras result in better capture of HCVs
 174 and passenger car licenses but often miss bus license plates. A rear facing
 175 camera has a high capture rate for urban busses, but low for both rigid and
 176 articulated HCVs that commonly have exhaust outlets after the driver cabin
 177 which trigger the camera. Passenger car capture rate is broadly consistent
 178 across the two configurations. Typically the decision of front or rear facing
 179 camera orientation is dictated by safety and accessibility rather than any
 180 traffic derived considerations however if possible the location of the camera
 181 can be changed to better capture the most prominent vehicles. A speed
 182 and acceleration module (SAM) consisting of three light beams was used

183 to capture the vehicle dynamics. The SAM was placed between 3 and 5
184 metres before the SDM to ensure that the vehicle dynamics were represen-
185 tative of the emissions being observed. The operation of all the devices was
186 controlled automatically by the RSD. The captured license plate data was
187 converted to vehicle-specific metadata using a lookup service provided by
188 CarWeb (<http://www.carweb.co.uk>).

189 . The RSD was calibrated twice daily, or whenever significant changes were
190 observed in ambient weather conditions (Rushton, 2016), using an internal
191 reference gas cell. Measurements were also audited every hour using blended
192 calibration gas with known concentrations of pollutants broadly representa-
193 tive of what would be expected in the plume of a petrol-powered vehicle.
194 The calibration gas measurements are compared to the known bottle gas
195 concentrations and lock out further measurements if the instrument does not
196 remain within an acceptable tolerance range (ESP, 2005).

197 *2.2. Identifying Extreme Measurements*

198 . A series of events with rare but high value events can be characterised
199 by extreme value distributions. Various forms of extreme value distribution
200 have been applied to many real world scenarios where the distribution of
201 the events' magnitude does not follow a normal distribution. The use of the
202 extreme value distribution extends from finance (Poon et al., 2004; Bensalah
203 et al., 2000) to hydrological data (Martins et al., 2000). There are three dif-
204 ferent types of extreme value distribution. These are called Weibull, Frechet
205 and Gumbel (Fréchet, 1928; Rosin, 1933; Gumbel, 1941, 1935). It has been
206 previously hypothesised that a small number of vehicles contribute an ex-

207 cess amount of pollution to the overall inventory (Bishop et al., 2016; Zhang
208 et al., 1994). This behaviour is compatible with the behaviours of extreme
209 value distribution functions. This behaviour can be seen in the observed data
210 histograms presented in Figures 3 and 4.

211 . A suitable distribution function is required to analytically describe popula-
212 tion behaviour. A good distribution function for describing vehicle emissions
213 must fit the data well and be parameterised in terms that are easily un-
214 derstandable in a real-world context. The Gumbel distribution meets these
215 criteria and was chosen for use in this study. The Gumbel function is pa-
216 rameterised by the modal (or highest observation frequency in this context)
217 value and a shape parameter that is related to the spread of the data. It
218 is possible to compare both the peak emissions and the spread of the data
219 of different population subsets in an analytical way using these parameters.
220 The Gumbel probability density function $P(x)$ is defined, where $z = \frac{x-a}{b}$,
221 and a and b are the modal value and the shape parameter respectively, in
222 Equation 1. No assumptions or first principles were used a priori to derive a
223 Gumbel or other distribution function therefore it is, at this point, suitable
224 to pick something convenient for analysis. There are other distributions that
225 match the general shape of the observations such as the gamma distribution
226 however their parameters are less intuitive and the distribution itself is less
227 convenient.

$$P(x) = \frac{1}{b} e^{-(z+e^{-z})} \quad (1)$$

228 **3. Results**

229 *3.1. Gumbel Distribution Fits*

230 . Each Euro class and fuel type pair were fitted to normal and Gumbel dis-
231 tributions with probability density functions (PDFs) and the theoretical /
232 empirical Quantile relationships were calculated and plotted onto Q-Q Plots
233 (Wilk and Gnanadesikan, 1968). A Q-Q plot demonstrates the relationship
234 between the expected and observed values in a distribution. A well modelled
235 distribution will correlate strongly along the 1:1 line. The distribution fit pa-
236 rameters were estimated using the Maximum Likelihood Estimation (MLE)
237 method from the *fitdistrplus* package in *R* (Wilks, 1938; Delignette-Muller
238 and Dutang, 2015; R Core Team, 2015). The PDF and Q-Q plot types
239 show the difference between the Gumbel and Normal distributions, and the
240 observed data.

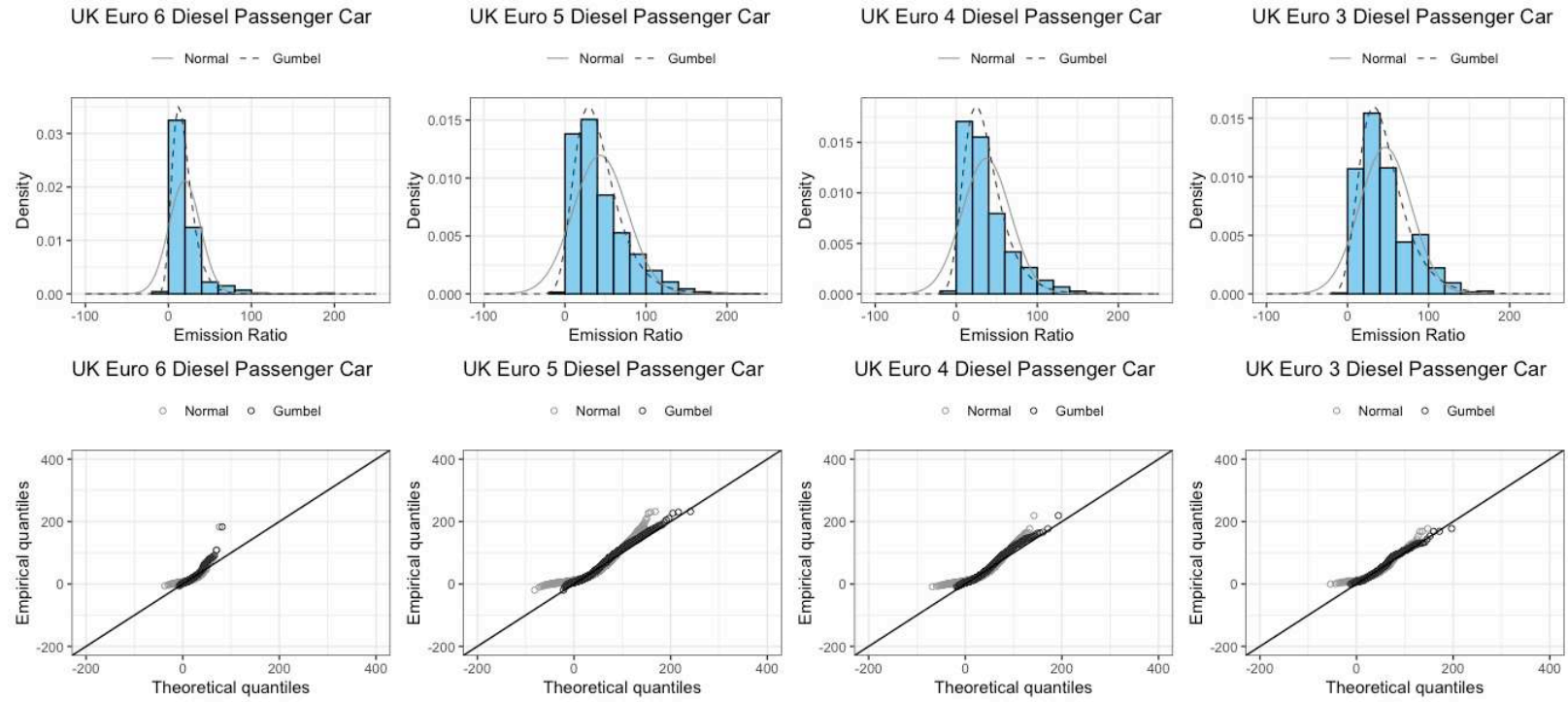


Figure 3: Probability density and quantile-quantile plots for the diesel passenger fleet in the UK. Normal distribution is light grey and solid, Gumbel distribution is dark grey and dashed.

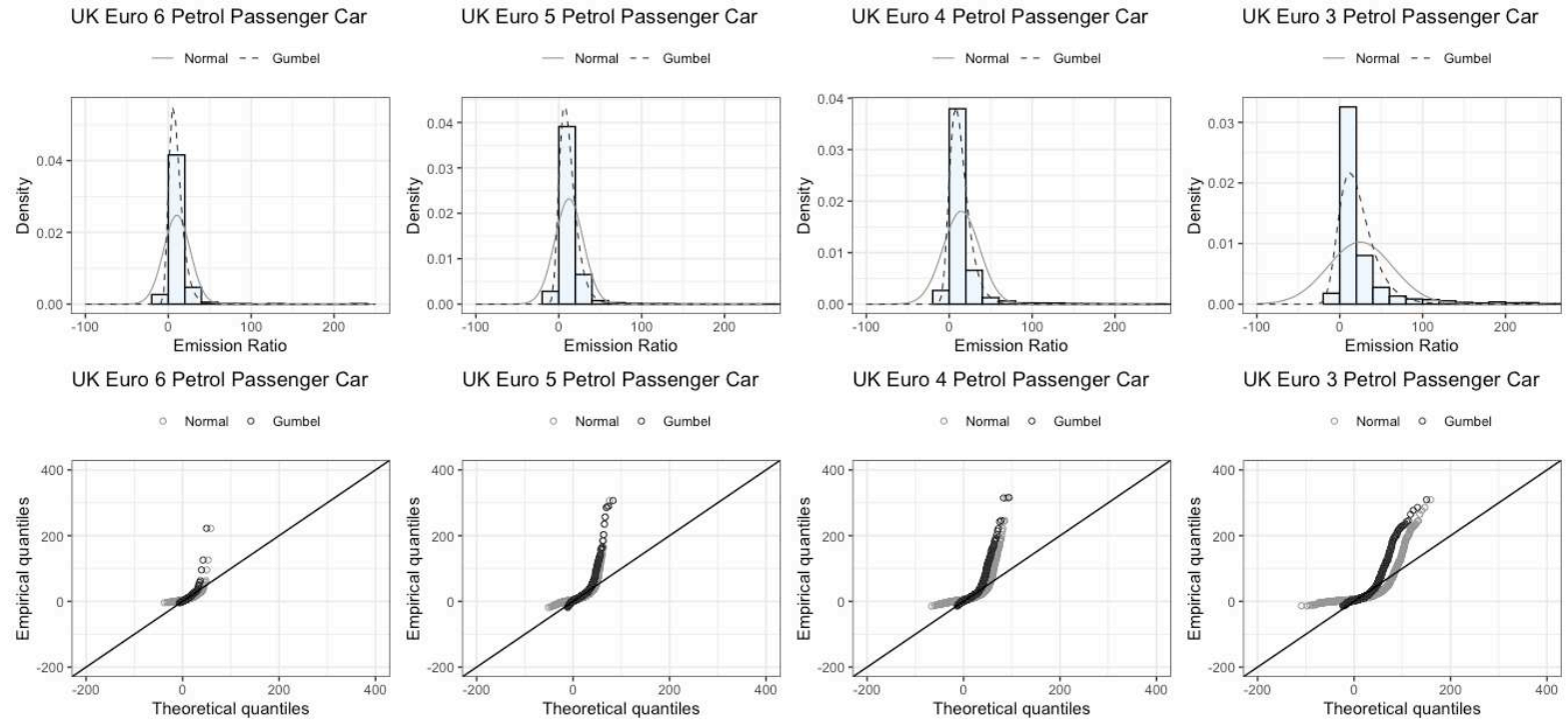


Figure 4: Probability density and quantile-quantile plots for the petrol passenger fleet in the UK. Normal distribution is light grey and solid, Gumbel distribution is dark grey and dashed.

241 . Figure 3 and Figure 4 show the fits for the fleets of diesel and petrol pow-
242 ered passenger cars respectively. For the diesel powered vehicles the Gum-
243 bel distribution fits the data more consistently than the normal distribution
244 showing reasonable agreement across the whole range of percentiles. The
245 normal distribution underestimates both the number of highest emitters and
246 lowest emitters in the population and fails to correctly identify the most fre-
247 quent value for emissions, suggesting that it is unsuitable for describing the
248 characteristics of vehicle emissions from these vehicle fleet subsets.

249 . The population of observed emissions ratios for petrol powered vehicles
250 mostly fit the Gumbel distribution. There is a small subset of the popu-
251 lation that deviate from the Gumbel distribution. It is hypothesised that
252 this deviation from the distribution function is caused by unusual behaviour
253 by a small subset of the population. This hypothesis was tested by cutting
254 successively larger percentiles from the top of the distribution function and
255 re-fitting the data to the distribution function.

256 . The higher quantiles side of the distribution begins to depart from the 1:1
257 line most noticeable in the petrol powered fleets but also in the Euro 6 diesel
258 fleets. It is hypothesised that the majority of the fleet follow the Gumbel
259 distribution and a small percentage of vehicles that do not. The fraction of
260 vehicles that do not follow the Gumbel distribution are termed '*off-model*'
261 and may be interpreted as candidate gross-emitting vehicles.

262 *3.2. Off Model Fraction Calculation*

263 . A goodness of fit measure is required to determine the quality of the repre-
264 sentation of the data by the model. The maximal value of this parameter can

265 be used to determine the best model parameters post-hoc. The goodness of
266 the fit between the data and the distribution function is determined by calcu-
267 lating the R^2 value of the relationship between the empirical and theoretical
268 quantiles. Cuts at each integer percentiles starting at 99 were performed to
269 test the hypothesis that the majority of the vehicle population conformed to
270 the Gumbel distribution. The R^2 values calculated for these data sets are
271 shown in Table 1. The highest percentile, maximal R^2 value was chosen as
272 the best model for that fleet subset. This percentile, P_{off} , was reported as
273 the off-model fraction (Table 2). The process was iterated a second time with
274 the off-model fraction to determine the parameters that define the off-model
275 fraction. The variation in R^2 statistic for each cut is shown in Figure 5. The
276 line for $R^2 = 0.98$ is shown as a red dash for comparative purposes. The
277 agreement with the model with well chosen cuts is graphically demonstrated
278 in Figure 6 as the Q-Q line best matches the 1:1 line and agrees with the
279 result generated using the maximising R^2 value approach.

280 . The real-world applicability of the fit parameters is important when com-
281 parison between fleet subsets is to be performed. A model that is represen-
282 tative of reality is important because non-realistic parameters lead to unfair
283 comparisons and wrong conclusions. The normal distribution does not repre-
284 sent the distribution of the observations, suggesting that it is not appropriate
285 for use in this context. The mean and standard deviation are not appropri-
286 ate parameters for describing the fleet. The Gumbel distribution provides
287 much better agreement with the data and its parameters can be used for
288 comparisons and combined with a well chosen data cut agree with the data
289 at $R^2 > 0.97$ in all cases. The approach outlined in this section creates three

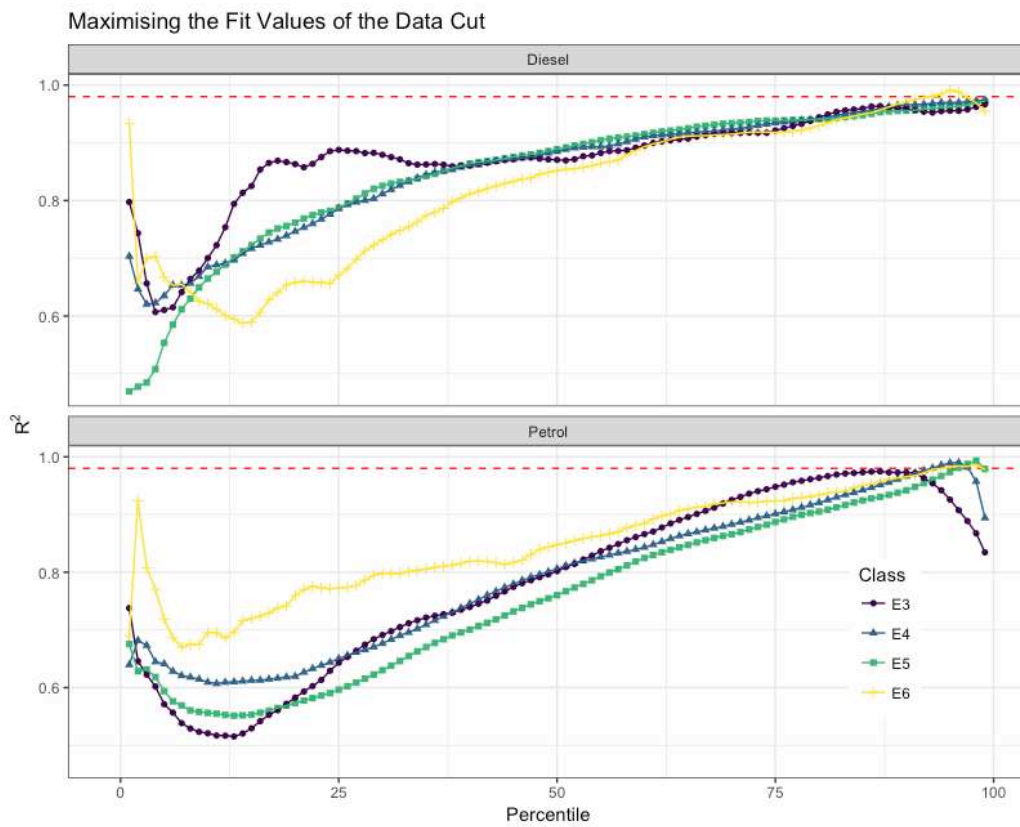


Figure 5: Variation in R^2 for increasing data cuts for the petrol and diesel vehicles. Euro class is indicated by colour and shape with $R^2 = 0.98$ indicated by the dashed red line.

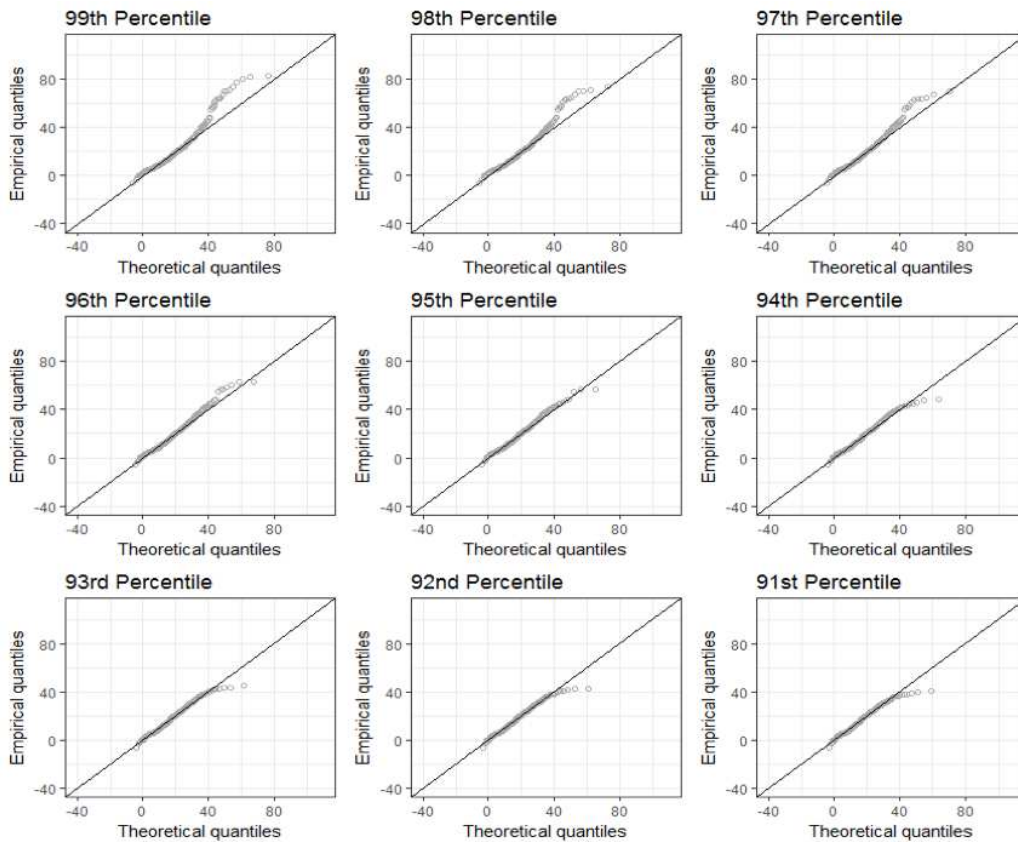


Figure 6: Variation in Gumbel distribution function with changing location and scale parameters for the UK Euro 6 diesel fleet

290 empirically derived parameters can be used to compare fleet subsets: the
 291 two Gumbel parameters and the off-model percentile. These parameters are
 292 based on large samples of real vehicles and are more representative of the
 293 population and allow for a meaningful and numerical comparison to be made
 294 between subsets. This method of analysis allows for a better understanding
 295 of the change in emission ratios as they relate to euro class and fuel type. It
 296 is possible to demonstrate that there has been a small improvement in the

297 emissions ratios of the petrol fleet from Euro 3 to Euro 6 and that there is
298 evidence of a step-change in emission ratios of the diesel fleet from Euro 3 to
299 5 and to Euro 6 and to assess the magnitude of these changes. This method
300 can be also applied to vehicles of a specific make, manufacturer, engine ca-
301 pacity or chassis platform given a population sample size of less than 200
302 vehicle observations (Chen et al., 2019).

Location	Fuel	Euro	n	Off Model Percentile	Fit R^2	Location ($NO : CO_2 \times 10^4$)	Scale
UK	Petrol	3	1701	87	0.975	7.8	8.3
		4	3732	96	0.990	6.7	7.2
		5	4382	98	0.993	6.5	7.3
		6	374	98	0.986	5.5	5.5
	Diesel	3	632	100	0.967	32.0	23.0
		4	2452	100	0.974	24.4	19.8
		5	5522	100	0.972	29.0	22.8
		6*	362	95	0.991	11.2	8.3

Table 1: Summary results table showing the off-model percentage and Gumbel distribution fit parameters for Aberdeen fleet subsections post-cut. The R^2 parameter is the modelled fit between the predicted and the empirical quantiles for each point.

*The Euro 6 designations included are those on the road during the data collection and are likely to be Euro 6a.

303 . The best fit parameters for each of the fleet subsets chosen is presented in
304 Table 1. In all but one case, Euro 3 diesel, cutting the data correctly results
305 in an R^2 parameter greater than 0.97. This result suggests that the majority
306 of the vehicles observed in each class can be parameterised by a Gumbel
307 distribution fitted to appropriately cut data. The implication of this is that
308 vehicle fleets with greater levels of NO_X control exhibit two-type behaviour
309 and that the fleet is comprised of two or more component parts. For the
310 purpose of this paper they can be thought of as normal and grossly emitting
311 vehicles relative to their category.

312 3.3. Vehicle Specific Power Bias Analysis

313 . There is a known association between Vehicle Specific Power (Jimenez-
314 Palacios, 1998) and high NO_X emission (Carslaw et al., 2013) and it would
315 be reasonable to expect the gross emitter events to be linked to the highest
316 VSP events. Each fleet subsection (Euro 3-6 petrol and Euro 6 diesel) were
317 split along two dimensions, VSP and emission ratios to link the VSP of a
318 given event to its emissions characteristics. The two VSP derived subsets
319 are referred to as an under-cut and an over-cut population based on their
320 VSP percentile, P_{VSP} . The cut point is defined as the off-model fraction
321 percentile derived from the emissions calculation, $P_{VSP} = P_{off}$. The under-
322 cut subset is the vehicles where $P_{VSP} < P_{off}$ and the over-cut subset is where
323 $P_{VSP} \geq P_{off}$. For example the 98th percentile of emissions was considered
324 the on-model fraction for Euro 5 petrol vehicles and the top 2nd percentile of
325 VSP measurements was considered the over-cut. A high VSP observation is
326 linked to a high emissions measurement if an event is included in the over-
327 cut and off-model sets. A high emissions measurement unrelated to a high

328 VSP observation would be under-cut and off-model. For example an emission
329 measurement in the top 2nd percentile attached to a VSP measurement in
330 the bottom 50th percentile would be off-model and under-cut however if its
331 VSP measurement was in the top 2nd percentile it would be off-model and
332 over-cut.

333 . This methodology was applied to all vehicles with off-model components.
334 The results of this analysis are shown in Figures 7 and 8. If VSP was the
335 dominant factor for causing off-model behaviour clustering would be expected
336 in the upper and lower panels. No such clustering is observed and the over-
337 cut VSP follow the trends of the under-cut VSP vehicles. The over-cut,
338 off-model vehicle is the highest in population NO_X emitter in only one case
339 from the current limited sample of six. There is no evidence of strong sys-
340 tematic bias towards high VSP vehicles and off-model behaviour observed
341 in any of these samples. This analysis suggests that whilst the VSP of a
342 vehicle is a contributing factor to its emissions (Carslaw et al., 2013), it is
343 not a systematic dominant factor when considering which vehicles are gross
344 emitter candidates. Gross-emitter candidates appear to be more related to
345 the mechanics of the vehicle, engine, and after treatment systems. In turn
346 this suggests that the solution to the problem of gross-emitter vehicles will
347 be predominantly mechanical rather than behavioural.

348 3.4. *Paramterising Observed Gross Emitter Candidates*

349 . The existence of off-model vehicles presents a problem for modelling the
350 fleet as the modeller cannot simply fit the Gumbel distribution to the data
351 and move on to the next step. The modeller must now understand the nature

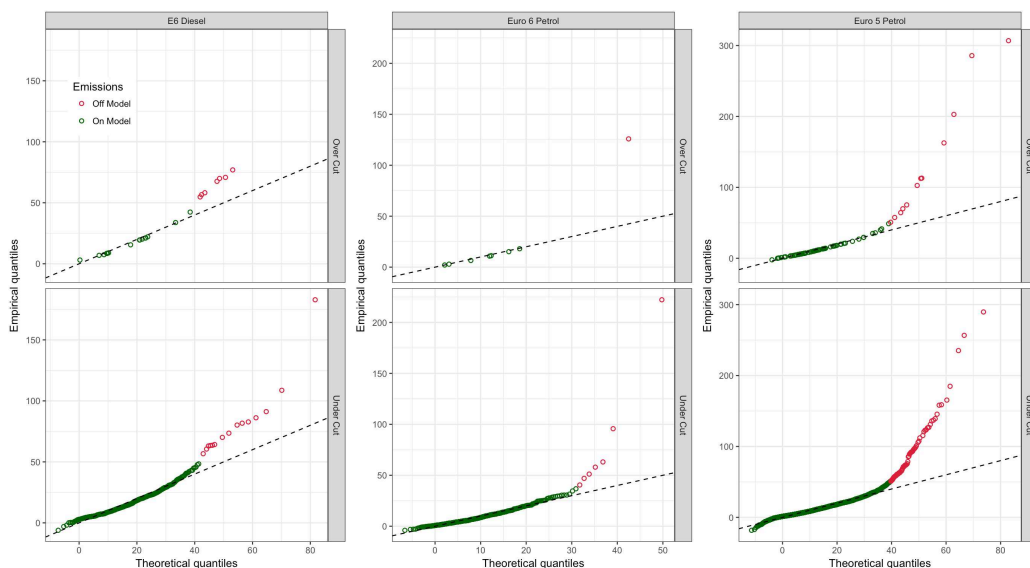


Figure 7: Q-Q plot showing on and off model vehicles split by Euro and fuel, and, under and over cut for VSP. On and off model vehicles are green and red circles respectively

352 of off-model vehicles or risk not accounting for some of the most important
 353 contributors to total emissions. Physically these vehicles might be thought of
 354 as having sub-optimal emission control systems due to their higher $NO:CO_2$
 355 emissions ratios. There are multiple reasons for why a vehicle's emissions
 356 control systems would not perform optimally. Cold-starts, ambient temper-
 357 atures or defeat devices may all contribute by some degree to the off-model
 358 fraction of newer fleets. Catalyst poisoning, sintering or physical damage
 359 may all contribute in varying degrees to reduction in catalyst efficiency in
 360 older fleets. Kadijk et al. (2018) presents some evidence that failed air-
 361 fuel mixture (λ) sensors may be responsible for high emissions from petrol
 362 vehicles. Those vehicles exhibiting off-model behaviour were grouped into
 363 separate subclasses of their euro and fuel class of vehicles, parameterised in-

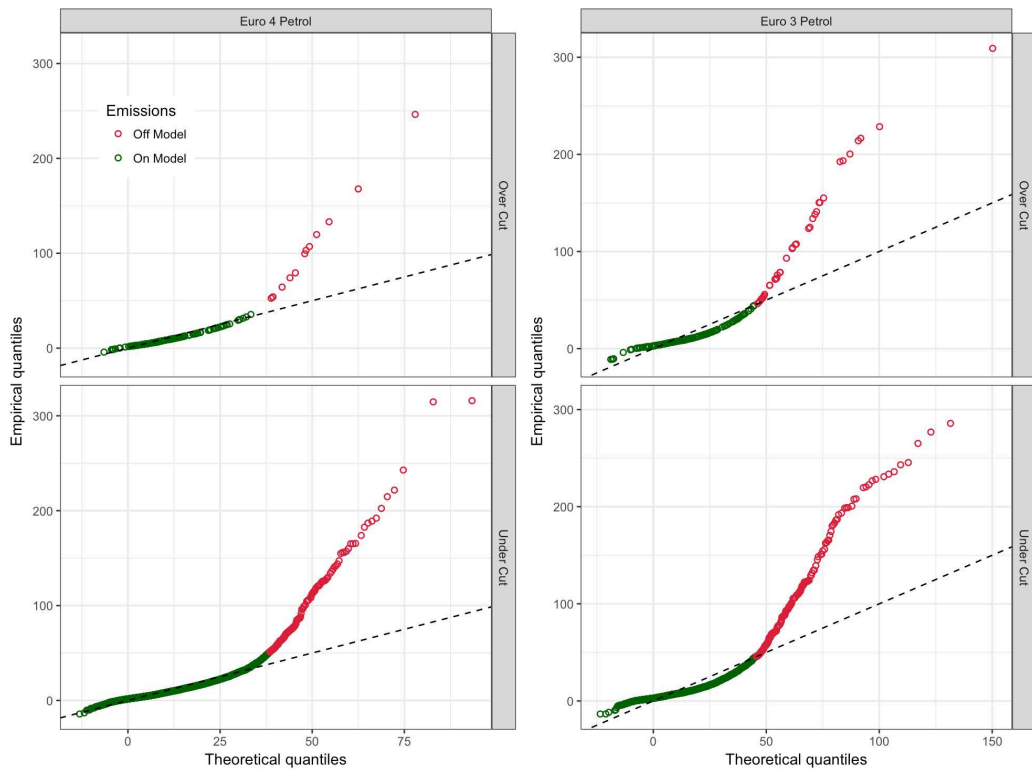


Figure 8: Q-Q plot showing on and off model vehicles split by Euro and fuel, and, under and over cut for VSP. On and off model vehicles are green and red circles respectively

364 dependently, and their contribution was added to the on-model component
365 of the fleet.

366 . There is some logic to the increased off-model percentile of petrol vehicles
367 however the following assertion is presented with the caveat that determining
368 the underlying cause of a vehicle's emission characteristics is beyond the scope
369 of this paper. The 2% of observed off-model vehicles in Euro 5 and Euro 6
370 petrol vehicles may be caused by cold starts because it is unlikely that the
371 vehicles in this fleet subset contains many failed three-way catalysts or λ -
372 sensors. As these components age and fail there is an increased fraction of
373 vehicles falling into the off-model subset and this is observed by an increased
374 off-model percentile. Regarding the diesel vehicles it is likely that all vehicles
375 are high emitters and the only variation is in the Euro 6 subset.

376 . The off-model fractions of the Euro 3 and Euro 4 passenger car petrol fleet
377 subsets were chosen for initial parameterisation because they had the largest
378 sample sizes of 222 and 150 respectively. Euro 6 diesel is included despite
379 the small sample size of 19 as they are the most relevant vehicle class to this
380 analysis and the observed distribution was assessed to be qualitatively similar
381 to a Gumbel distribution. The Euro 5 and 6 petrol vehicle subsets with
382 identified off-model contributions did not contain enough off-model vehicles
383 to fit distribution functions to with any degree of confidence.

384 . The functions for the on and off model components were plotted and nor-
385 malised then overlaid on the data. The off-model fraction is small for both the
386 Euro 4 petrol and Euro 6 diesel fleets so an additional and exaggerated off-
387 model component has been added to the data. The exaggerated component

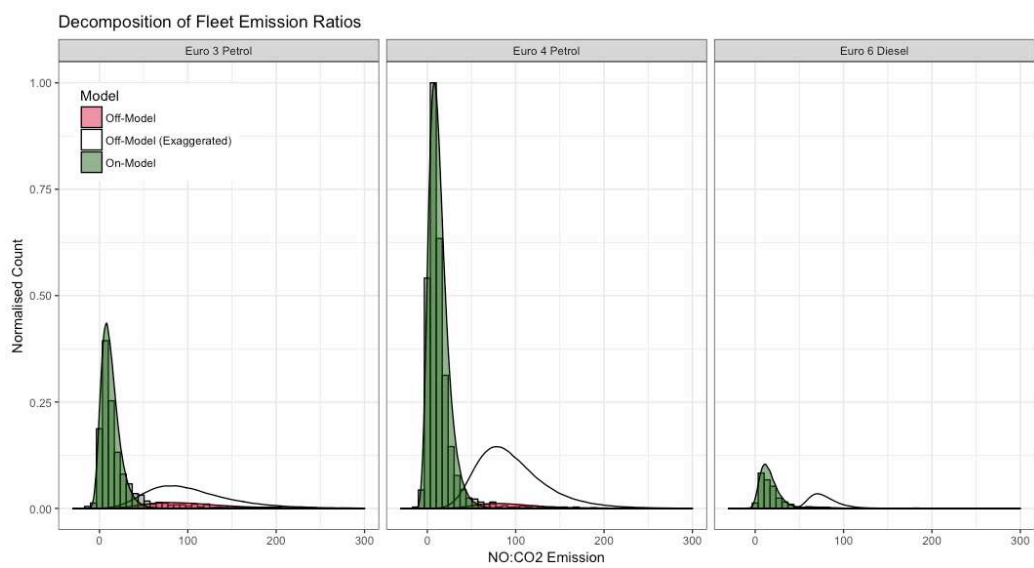


Figure 9: Decomposition of the fleet subsets into their off-model (red) and on-model (green) fractions and overlaid on the observed data (grey histogram). An indicative and exaggerated off-model component has been added, without, that shows the magnitude of the Gumbel function if the fleet was 50% off-model.

Type	Sample	Location	Shape
Euro 3 Petrol	150	80.9	38.7
Euro 4 Petrol	222	78.2	31.1
Euro 6 Diesel	19	70.5	13.1

Table 2: Off-model Gumbel distribution parameters for petrol powered Euro 3 and Euro 4 UK fleet subsections

388 was calculated based on the assumption that 50% of the vehicles in the fleet
 389 were off-model and is for illustrative purposes only. These distributions are
 390 shown in Figure 9. Two-sample KS tests were performed on the function and
 391 the data to determine the similarity between the model predictions and the
 392 data. The p statistics for the Euro 3 petrol vehicles were $p = 1.69 \times 10^{-3}$ and
 393 for the Euro 4 petrol vehicles were $p < 2.2 \times 10^{-16}$. The p -values generated
 394 suggests that there is good agreement between the predicted distribution of
 395 both the normally emitting vehicles and the gross-emitters, suggesting that
 396 this methodological approach can provide useful insight to distribution of
 397 emission ratios in these fleets. The number of vehicles in the Euro 6 diesel
 398 category was not large enough to generate a reliable p -value however the
 399 qualitatively successful application of this methodology suggests that given
 400 a bigger data set this feature could be replicated in a more robust statistical
 401 manner.

402 4. Conclusion and Discussion

403 4.1. Conclusions

404 . The method developed in this paper provide a framework for comparing
405 vehicle fleet subsets from remote sensing data. This approach has been used
406 to demonstrate the magnitude of impact that a legislative change has had on
407 the emissions ratios of nitric oxide. Further application of this methodology
408 will allow for almost immediate appraisal of new legislation Euro 6c+ vehicles
409 as they enter the fleet when new data becomes available. This methodology
410 can also be used to investigate other subsets such as vehicle make and model.

411 . The results presented in this paper suggest that the the vast majority (87%
412 to 100%) of NO_X remotely sensed emission ratios for vehicles in any given
413 euro or fuel subset can be described using a well-fitted Gumbel distribution
414 function. In fleet subsets where significant work has ben done to reduce
415 NO_X emissions a small number of gross-emitter candidate vehicles can be
416 observed in their deviation from this model. For the normally behaving
417 vehicles the fitted parameters from the Gumbel distribution function can be
418 used to compare and contrast fleet emission rates in a more precise way.
419 This new methodology allowed the level of Euro 6 emissions to be tested
420 and compared to other Euro and fuel-type fleet subsets for the first time
421 ignoring high emitters. It can now be shown that a new Euro 6 diesel vehicle
422 is likely to emit slightly more $NO:CO_2$ than a Euro 3 petrol powered vehicle
423 when passing through a remote sensing device. This is approximately half
424 the emission of a Euro 5 or 4 diesel vehicle. Given that a Euro 3 petrol
425 powered vehicle is not an ultra-low emission zone (ULEZ) compliant vehicle

426 there should be some concern that the introduction of ULEZ into city centres
427 may not lead to a significant reduction in ambient NO_X concentration. No
428 significant change was observed between Euro 3, 4 or 5 diesel cars as might
429 be expected with step-changes in the legislation.

430 *4.2. Discussion*

431 Remote sensing studies have previously demonstrated their value in ob-
432 serving the differences between in-situ vehicles, and laboratory and PEMS
433 based testing environments. The results and methodologies demonstrated
434 in this paper build on this work, showing that an appropriate function to
435 parameterise this data is a Gumbel distribution. The use of the Gumbel dis-
436 tribution to describe the observation improves the investigative capacity that
437 RSD observations can generate. Some simple cases of application have been
438 demonstrated and results have been presented and it has been confirmed
439 that the difference between Euro 3, 4 and 5 diesel passenger car emission
440 rates is minimal. This methodology allows for more naturalistic and gran-
441 ular descriptions of the fleets to be produced which both account for the
442 natural variation in emissions between similar vehicles and those vehicles
443 with abnormally high emission rates.

444 . The new method using the Gumbel distribution can be used to make strong
445 assessments about the differences between fleet subsets at any level of granu-
446 larity. This paper investigated the variation between different Euro class and
447 fuel types. The difference between cities or sub-regions within cities and tem-
448 poral differences may also be assessed. The variation between make, marque,
449 year of first introduction, level of WLTP or RDE compliance if not stated

450 explicitly, engine size or other parameters can be analysed/ in the same way
451 given a large enough data-set. Chen et al. (2019) indicates that this number
452 may be less than 200 vehicles per subset, well within the capability of an
453 RSD campaign.

454 . The characterisation of the on-model and off-model fleets mean that an
455 observer can now assess the likelihood that a vehicle is operating in a sub-
456 optimal way. With appropriate underlying infrastructure the vehicles that
457 are performing within the expected window can be identified using a real-
458 time, big-data approach that compares each vehicle observed to every other
459 vehicle. Vehicles suspected as having SCR emulators (OEM defeat devices
460 or customer fitted) may be identifiable. This may provide a useful tool for
461 compliance monitoring in the future.

462 . Improving the statistical framework around individual vehicle emissions
463 and how they are positioned within the fleet presents a further use case
464 related to clean air zone enforcement. It may be desirable in the course
465 of enacting and enforcing future clean air zones to penalise drivers of ex-
466 cessively highly emitting vehicles on a case by case basis. One-off individual
467 measurements may struggle to identify the worst emitters and may be further
468 confounded by idiosyncrasy in vehicle emission control systems and driver be-
469 haviour. Repeated measurements of the same vehicle may be able to identify
470 those vehicles that are consistently emitting higher than the rest of the fleet.
471 Repeated measurements of the same vehicle become more likely if remote
472 sensing devices are more widely deployed in the future. Targeted schemes to
473 remove the most highly emitting vehicles would become more realistic. This

474 methodology, coupled with the correct infrastructure, could provide a use-
475 ful tool for identification of candidate gross-emitter vehicles. These vehicles
476 could then be flagged as a gross emitter candidate, potentially triggering a
477 more thorough emissions test at next routine inspection. This type of fleet
478 surveillance and targeted intervention, when coordinated with more targeted
479 RDE testing by type approval, could give authorities some of the tools they
480 need to reduce the number of high emitting new diesel cars on the road
481 whilst minimising the disruption to those vehicles that are performing at a
482 level consistent with the requirements of the legislation.

483 **5. Future Work**

484 . Further important use cases of this methodology include assessing the effec-
485 tiveness of emissions reduction systems on Euro 6c, 6d-temp and 6d vehicles
486 as they enter the fleet. Each of these legislative changes are changes to the
487 test procedure with Euro 6d-temp and Euro 6d requiring real driving emis-
488 sions tests to be within a conformity factor of legislation ($CF_{d-temp} = 2.1$ and
489 $CF_d = 1.5$) and this is expected to result in real-world reduction in tailpipe
490 emission. Using the methods developed in this paper a more representa-
491 tive and useful comparison could be made between these new type approval
492 classes, each other, and those currently on the road. These comparisons could
493 be completed reasonably quickly after the vehicles are introduced to the fleet
494 as a sample size of the order 100 will give statistics that are comparable to
495 the current Euro 6 fleet.

496 . Different manufacturers and platforms solve the NO_X emissions problems
497 in different ways. Whilst the sample sizes presented in this paper are too

498 small to assert with any confidence that a particular manufacturer, make,
499 model or platform is performing better or worse than another, as the num-
500 ber of observations increase, the data can be cut into smaller, more specific,
501 subsections allowing for more targeted investigation to be performed. Ex-
502 tended and longitudinal remote sensing studies, ideally with a time period
503 greater than one year, will provide the number of measurements required
504 to assess these differences or similarities in a statistically robust way, pro-
505 viding useful information to local authorities, vehicle manufacturers and the
506 car-buying public about the emissions of their choice of vehicle. Addition-
507 ally the longitudinal study approach will allow identification of any temporal
508 and seasonal changes to vehicle emission rates. Of special interest is the im-
509 pact of ambient temperature on emissions due to changes in cold starts and
510 cold running as the wording of the Euro class legislation allows for emissions
511 control systems to be switched off if ambient temperatures are not within a
512 specified operational window. The interdependence of multiple factors could
513 be analysed in some depth given a large enough sample size.

514 . Light commercial vehicles are an untested segment of the fleet and an im-
515 portant avenue for future investigation. Understanding the impact of light
516 commercial vehicles is critical to assessing the impact and effectiveness of
517 ULEZ introduction. At the time of data collection there were no Euro 6
518 diesel LCVs observed in the UK so no analysis could be performed. At the
519 time of writing the penetration of Euro 6 light commercial vehicles will have
520 increased to the point where general surveys are likely to contain enough
521 vehicles to perform useful statistical tests for comparison. Data has been
522 collected for Euro VI HCVs however given the difference in legislation sur-

523 rounding these engines and the complexities relating to engine specification
524 and after-treatment systems further work is required both to understand,
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