NESCAUM
www.nescaum.org

Northeast States for Coordinated Air Use Management
89 South Street, Suite 602 Boston, MA 02111
Phone 617-259-2000 Fax 617-742-9162
*Paul J. Miller, Executive Director*

October 21, 2021

Michael S. Regan
Administrator
U.S. Environmental Protection Agency
Washington, DC

Austin Brown
Senior Director for Transportation Emissions
Council on Environmental Quality
Washington, DC

Via Email

Dear Administrator Regan and Dr. Brown:

The Northeast States for Coordinated Air Use Management (NESCAUM)[1] writes to urge prompt action to promulgate robust emission limits for on-road heavy-duty engines and vehicles. Specifically, we strongly encourage EPA to propose and ultimately adopt truck pollution limits equivalent in stringency to California's recent Heavy-Duty Omnibus Regulation. Because major revisions to truck emission regulations occur relatively infrequently, we now have the rare opportunity to pursue technologically aggressive but achievable emission standards. Trucks bought today will operate on our nation's roads for many years to come, thus failure to seize the full benefits of what can be reasonably anticipated to be technologically feasible will be a missed opportunity having repercussions for excess truck pollution far into the future.

A large segment of the Northeast's population occurs along the I-95 corridor, and the corridor's southwest to northeast orientation often aligns with the air pollution transport pathways during the Northeast's worst ground-level ozone episodes. Oxides of nitrogen (NOx) are a primary precursor to the formation of this ozone, and on-road heavy-duty diesel vehicles are among the largest collective source of NOx emissions in the Northeast. NOx is also an important contributor to secondary fine particulate matter formation, acid deposition, aquatic eutrophication, and visibility impairment in our region. The development of new truck engine emission standards and test procedures will achieve much needed NOx reductions from this source category. The long term transition to electric trucks notwithstanding, diesel vehicles will continue to be manufactured for years to come and will be on the road for decades thereafter. Northeastern states struggling with both attaining and maintaining health-based air quality standards need substantial reductions from these vehicles now.

Since the introduction of the 2007/2010 heavy-duty engine emissions standards, there have been significant technology advances that provide a technologically feasible and cost-effective foundation for greatly reducing NOx emissions beyond what was previously considered achievable. Manufacturers can do this through hardware upgrades and new aftertreatment systems that build upon the architecture of current emissions control systems. In light of these advances, the California Air Resources Board approved in August 2020 the adoption of the Heavy-Duty Omnibus Regulation for on-road diesel engines that will achieve a 90 percent or

[1] NESCAUM is the regional association of eight northeastern state air quality agencies comprised of Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

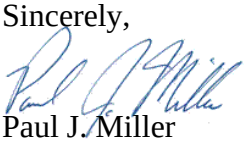
greater reduction in NOx emissions from on-road diesel truck engines. The Omnibus Regulation also includes an in-use testing program, emissions warranty period and useful life requirements, emissions warranty information and reporting requirements, and other elements that will also be important aspects of a successful national program.

Along with the necessary stringency, promulgation of new truck standards also needs to be done on the quickest timeline possible in order to assist states in meeting statutory deadlines for reducing air pollution within their borders. If set at the appropriate level on an expedited schedule, new on-road heavy-duty truck engine standards will provide a low-cost pollution reduction opportunity that brings cleaner air sooner to our region. It will also have real near-term benefits for environmental justice areas and overburdened local communities that bear a disproportionate share of traffic-related air pollution, particularly those in close proximity to highways, ports, warehouses, railyards, and other high-traffic locations.

It is our understanding that EPA will be issuing in January 2022 a notice of proposed rulemaking to set 2027 truck NOx standards, and that EPA will issue a final rule by the end of 2022. As a critical public health need, it is imperative this effort remain on schedule. It is also critical that EPA's standards be as stringent as California's. Trucks, like air pollution, cross state borders, and a strong national program will help our states' efforts by reducing pollution from vehicles registered elsewhere that operate within their borders.

We are encouraged by the administration's strong stated commitment to public health, the environment, and environmental justice. A timely and robust national truck engine NOx rule harmonized with California's will be an important and significant demonstration of that commitment.

Sincerely,



Paul J. Miller
Executive Director

cc: NESCAUM Air Directors
EPA OAR: Joseph Goffman
EPA OTAQ: Sarah Dunham, Bill Charmley
EPA Region 1: Lynne Hamjian, Cynthia Greene
EPA Region 2: Rick Ruvo