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NESCAUM'S TESTIMONY ON EPA'S PROPOSED CONTROL OF AIR POLLUTION FROM NEW MOTOR VEHICLES: HEAVY-DUTY ENGINE AND VEHICLE STANDARDS

Docket ID No. EPA-HQ-OAR-2019-055

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My name is Coralie Cooper and I am Deputy Director at the Northeast States for Coordinated Air Use Management (NESCAUM).

NESCAUM is the regional association of state air quality agencies in New England, New York and New Jersey. Our member state agencies have the primary responsibility in their states for implementing clean air programs that achieve the public health and environmental protection goals of the federal Clean Air Act. Stringent emissions standards for heavy-duty engines and vehicles are essential to the fulfillment of that mission. Most of our member states are signatories to the Medium-and Heavy-Duty Zero-Emission Vehicle Memorandum of Understanding, a collaboration of 18 jurisdictions committed to fostering a self-sustaining market for zero emission trucks and buses.

A large portion of the NESCAUM region is designated as being in nonattainment with the 2015 8-hour average ozone NAAQS of 70 parts per billion (ppb). NOx emissions are a primary precursor to the formation of ozone, and on-road heavy-duty diesel vehicles are among the largest collective source of NOx emissions in the Northeast. A significant portion of the Northeast struggles to comply with the less stringent 2008 8-hour ozone NAAQS of 75 ppb. This week, EPA proposed to reclassify the New York City/Long Island-Northern New Jersey-Southwest Connecticut area to "severe" nonattainment.

Given the urgent need to reduce NOx emissions from heavy-duty vehicles, we strongly encourage EPA to finalize NOx limits equivalent to those in the California Air Resources Board (CARB)'s Heavy-Duty Omnibus Regulation. Specifically, NESCAUM supports the adoption of a 0.020 gram NOx engine standard in 2027 at intermediate useful life and a 0.035 gram NOx standard at full useful life as specified in the Omnibus regulation. Ample data exist supporting the feasibility of introducing a 0.020 gram NOx standard at intermediate useful life in 2027.

The Northeast will be subject to new attainment deadlines in 2027 and likely 2033. The Clean Air Act requires ozone NAAQS attainment as expeditiously as possible, and EPA's proposed Options 1 and 2 do not meet this requirement. Establishing a 0.02 g/bhp-hr NOx standard at intermediate useful life for model year 2027 is the most expeditious as possible path called for by the Clean Air Act and anything less than this will not be acceptable.

Should EPA instead choose Option 1, we urge the Agency to make the NOx idle standard mandatory in 2027; increase the stringency of the low load certification cycle standard; harmonize with CARB on NOx family emission limit caps and timing; and properly account for heavy-duty ZEV sales in the baseline.

We strongly oppose Option 2 in EPA's proposal. Technical analyses demonstrate that substantially more stringent NOx controls are feasible and cost effective for 2027 and subsequent model year engines and vehicles than would be required under this option.

We will be providing more detail on these issues in NESCAUM's written comments on the proposal.

Thank you.