



June 3, 2020

Mr. Andrew Wheeler, Administrator  
U.S. Environmental Protection Agency  
Mail Code 1101A  
1200 Pennsylvania Ave. N.W.  
Washington, DC 20460

Dear Administrator Wheeler:

The Ozone Transport Commission (OTC) commends the U.S. Environmental Protection Agency (EPA) for moving forward with the *Cleaner Trucks Initiative* in January 2020 by issuing the Advanced Notice of Proposed Rulemaking (ANPR) “Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine Standards” [85 Fed. Reg. 3306-3330 (January 21, 2020)]. The OTC previously wrote to you in August 2019 emphasizing the need in our region for updated standards to address emissions of nitrogen oxides (NOx) from highway heavy-duty trucks and engines, and asking you to make this one of EPA’s most urgent priorities.<sup>1</sup> We subsequently commented in February 2020 on the ANPR in support of stronger national standards.<sup>2</sup>

The Ozone Transport Region continues to experience chronically high ground level ozone pollution above national ambient air quality standards that affects the health and well-being of our citizens and our environment. Furthermore, nitrates formed from NOx are key components of fine particulates, especially in winter, which contribute to premature death and other adverse impacts at levels below current air quality standards, as shown by the best available science.<sup>3</sup> Persistent nitrate levels also play an increasingly larger role in poor visibility conditions in our national parks and wilderness areas while other haze-forming pollutants (e.g., sulfates) decline. This is a concern for our

<sup>1</sup> OTC letter to EPA Administrator Wheeler re: *Cleaner Trucks Initiative*, August 28, 2019 (available at

<https://otcair.org/upload/Documents/Correspondence/EPA%20NOx%20Letter.pdf>.

<sup>2</sup> OTC/MANE-VU Comments to EPA on ANPR *Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine Standards*, February 20, 2020. Available at

<https://otcair.org/upload/Documents/Correspondence/OTC-MANEVU%20CTI%20ANPR%20comments%2020200220%20final.pdf>.

<sup>3</sup> Letter from Christopher Frey, *et al.*, to EPA Administrator Andrew Wheeler, October 22, 2019, Docket ID No. EPA-HQ-OAR-2015-0072, Subject: Advice from the Independent Particulate Matter Review Panel (formerly EPA CASAC Particulate Matter Review Panel) on EPA’s Policy Assessment for the Review of the National Ambient Air Quality Standards for Particulate Matter (External Review Draft – September 2019). Available at:

[https://yosemite.epa.gov/sab/sabproduct.nsf/81DF85B5460CC14F8525849B0043144B/\\$File/Independent+Particulate+Matter+Review+Panel+Letter+on+Draft+PA.pdf](https://yosemite.epa.gov/sab/sabproduct.nsf/81DF85B5460CC14F8525849B0043144B/$File/Independent+Particulate+Matter+Review+Panel+Letter+on+Draft+PA.pdf).

Connecticut  
Delaware  
District of Columbia  
Maine  
Maryland  
Massachusetts  
New Hampshire  
New Jersey  
New York  
Pennsylvania  
Rhode Island  
Vermont  
Virginia

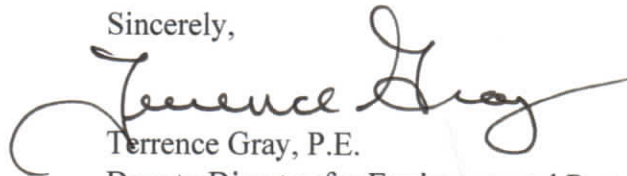
89 South St., Suite 602  
Boston, MA 02111  
(617) 259-2005  
[www.otcair.org](http://www.otcair.org)

regional haze planning organization, the Mid-Atlantic/Northeast Visibility Union (MANE-VU).<sup>4</sup>

We are encouraged by EPA's recent action with the ANPR to move forward with the *Cleaner Trucks Initiative*. We are mindful, however, that time remains of the essence due to impending statutory deadlines in our region to attain air quality standards, the long fleet turnover rates for many existing truck types, and the stubbornly persistent pollution levels we continue to experience. To that end, we urge EPA to push forward on an aggressive timeline with a robust program that reduces new engine NOx emissions 90 percent and benefits from the on-going technical and policy work by the California Air Resources Board (CARB).

It continues to be our intent to work collaboratively with EPA and CARB in pursuing the strongest possible program that brings clean air benefits to the tens of millions of people living in our region. Such a program will not only distribute costs and efforts in an equitable manner, but will also provide a broad range of co-benefits that appropriately maximizes economic, health and environmental benefits for all.

Sincerely,

A handwritten signature in black ink, appearing to read "Terrence Gray", with a large, sweeping flourish extending to the left.

Terrence Gray, P.E.

Deputy Director for Environmental Protection  
Rhode Island Department of Environmental Management  
OTC Chair

cc: OTC Commissioners and Air Directors  
U.S. EPA Regional Administrators for Regions I, II and III

---

<sup>4</sup> All OTC members excepting Virginia are members of MANE-VU, as are the St. Regis Mohawk Tribe and Penobscot Nation.