



**OZONE  
TRANSPORT  
COMMISSION**

Mr. Andrew Wheeler, Administrator  
United States Environmental Protection Agency  
Mail Code 1101A  
1200 Pennsylvania Avenue N. W.  
Washington, DC 20460

AUG 28 2019

Dear Administrator Wheeler:

In November 2018, the U.S. Environmental Protection Agency (EPA) announced its Cleaner Trucks Initiative as the launch of a future rulemaking to update standards for emissions of nitrogen oxides (NO<sub>x</sub>) from highway heavy-duty trucks and engines. The Ozone Transport Commission (OTC) and the Mid-Atlantic/Northeast Visibility Union (MANE-VU) support this effort. Since this announcement, to our knowledge, EPA has not moved to propose new standards. We are concerned that without this important measure we will not attain air quality standards by mandated attainment dates. We ask EPA to make this initiative one of its most urgent priorities.

In the Ozone Transport Region, NO<sub>x</sub> emissions from highway trucks are major contributors to unhealthy levels of ground-level ozone and fine particulate matter, and approximately 20 percent of the Region's total NO<sub>x</sub> emissions. Parts of the Region continue to experience persistently high ozone levels affecting tens of millions of people, and with flattening ozone levels in recent years, we have lost forward momentum after three decades of improving air quality. Highway trucks often travel long distances and can be registered in states far from where they operate. Therefore, a strong national program to reduce highway truck emissions holds great promise for significant public health benefits across the country.

EPA last adopted NO<sub>x</sub> standards for heavy-duty vehicles in 2001. Since then, numerous technology advances have occurred that are capable of substantially reducing NO<sub>x</sub> emissions while also improving fuel use efficiency beyond current requirements. The California Air Resources Board (ARB) projects that heavy-duty diesel NO<sub>x</sub> emission standards can be lowered by 2024 to 0.05 grams per brake horsepower-hour (g/bhp-hr) without significant engine modifications.<sup>1</sup>

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<sup>1</sup> California Air Resources Board, "California Air Resources Board Staff Current Assessment of the Technical Feasibility of Lower NO<sub>x</sub> Standards and Associated Test Procedures for 2022 and Subsequent Model Year Medium-Duty and Heavy-Duty Diesel Engines," April, 2019

Further, ARB expects that more stringent NOx standards can be cost-effectively established for model year 2027 engines. Similarly, a 2019 whitepaper by the Manufacturers of Emission Controls Association shows several technologically and economically feasible compliance pathways towards heavy-duty engines capable of simultaneously achieving 0.05 g/bhp-hr NOx emissions and higher engine efficiencies in 2024.<sup>2</sup> These types of approaches are being considered and discussed by industry in preparation for significantly more stringent NOx standards.

In setting new diesel engine NOx standards, EPA should adopt the most stringent technically feasible and cost-effective limits available. Promulgation of new standards also needs to be done on the quickest timeline possible so that we can attain air quality standards as expeditiously as possible. We strongly support ARB's technical and policy work on heavy-duty diesel NOx standards. We also firmly believe that a constructive collaboration between EPA and ARB resulting in the timely adoption of stringent NOx limits capable of meeting our Region's needs will be the optimal outcome.

Sincerely,



Shawn M. Garvin  
Secretary, Delaware Department of Natural  
Resources & Environment Control  
OTC Chair

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

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<sup>2</sup> Manufacturers of Emission Controls Association, "Technology Feasibility for Model Year 2024 Heavy-Duty Diesel Vehicles in Meeting Lower NOx Standards," June 2019