

As Prepared for Delivery

Comments of Paul G. Billings
National Senior Vice President, Public Policy
American Lung Association

On

The U.S. Environmental Protection Agency
Control of Air Pollution From New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards
Notice of Proposed Rulemaking
Docket ID No. EPA-HQ-OAR- 2019-0055

April 12, 2022

Good morning, I am Paul Billings, National Senior Vice President of Public Policy at the American Lung Association. The American Lung Association strongly supports the cleanup of pollution from heavy duty engines and vehicles. We urge EPA to finalize the rule this year - 2022

First, we want to thank EPA for conducting this hearing, providing more time for the public to sign up prior to the hearing and adding an additional day to hear public testimony.

This proposal is long overdue. EPA last strengthened the NOx and PM emissions standards for trucks 22 years ago, which were fully implemented in 2010. The technology is available now to meet stronger standards.

Trucks remain a dominant source of NOx pollution in many communities, threatening the health of millions of people. In 2016, local and state air pollution control agencies led by the South Coast Air Quality Management District petitioned EPA to set more protective standards. The American Lung Association joined with eight health, medical and nursing organizations in a July 2016 letter urging then-EPA Administrator Gina McCarthy to “promptly propose a new standard to cut emissions of oxides of nitrogen (NOx) from heavy-duty vehicles by 90 percent, limiting emissions to 0.02 grams per brake horsepower-hour (g/bhp-hr).” Our letter continued, “Cutting these emissions will significantly reduce ambient ozone pollution in our communities and help reduce the enormous health burden air pollution imposes on people who live, work or attend school near roadways.”¹

Today, the American Lung Association reiterates that request.

Seventy-two million people live near truck routes, and this puts their health at risk. They are more likely to be people of color and those with lower incomes. Cleaning up trucks is an environmental justice issue.

EPA’s Proposed Option number 1 is the stronger option for public health because it provides greater pollution reduction, and it would result in up to 2,100 fewer premature deaths and a wide range of other health benefits, especially for children and people with chronic diseases like asthma.

EPA should strengthen the standards even further by ensuring that the rules reflect the full life of heavy-duty vehicles. The proposal’s Option 1 does increase the warranty and useful life requirements above current levels, but they still fall short of reflecting the full life of these

vehicles. Ensuring that the warranty and useful life requirements meet 100% of the expected life of these vehicles will ensure health benefits throughout their life. EPA should align the stringency timelines and durability of the real-world engine performance requirements with the California rules at a minimum. EPA should also ensure that the final standards must cover engines during all of their operating environments and not just at peak highway running capacity.

Two weeks ago, the American Lung Association released a new report – [Zeroing in on Healthy Air](#). The report showed the enormous public health and climate benefits of a transition to zero-emission vehicles power by a clean, non-combustion renewable electricity grid. We found that over the next 30 years 110,000 premature deaths could be avoided.

We urge EPA to finalize stronger truck standards this year and promptly propose additional rules to accelerate the transition to zero emission vehicles.

Thank you.

¹ [“Health and Medical Organizations Letter to EPA on Truck NOx Standards.”](#) Received by EPA Administrator Gina McCarthy, 19 July 2016.