Electronic Submittal

February 20, 2020

Administrator Andrew Wheeler
U.S. Environmental Protection Agency
EPA Docket Center, EPA/DC
EPA WJC West Building
1301 Constitution Ave. NW, Room 3334
Washington, DC 20005

RE: Docket No. EPA–HQ–OAR–2019–0055; Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine Standards; (85 FR 3306 (Jan. 21, 2020)).

Dear Administrator Wheeler:

Introduction

Natural Gas Vehicles for America (NGVAmerica), the Coalition for Renewable Natural Gas (RNG Coalition), the American Public Gas Association (APGA), and the California Natural Gas Vehicle Coalition (CNGVC) (hereinafter “joint commenters”) appreciate the opportunity to provide comments on the U.S. Environmental Protection Agency’s Cleaner Trucks Initiative. The EPA’s Advance Notice of Proposed Rulemaking (ANPRM) concerning the Cleaner Trucks Initiative was published on January 21 in the Federal Register, soliciting comments on future emission and testing requirements for medium- and heavy-duty engines and trucks and incentives that would encourage the development and use of cleaner trucks.

NGVAmerica is the national trade organization dedicated to the development of a growing, profitable, and sustainable market for vehicles and carriers powered by clean, affordable and abundant natural gas or biomethane. Our 200-plus member companies produce, distribute, and market natural gas and biomethane, manufacture and service natural gas vehicles, engines, and equipment, and operate fleets powered by clean-burning gaseous fuels across North America.
The RNG Coalition is a non-profit association of companies and organizations dedicated to the advancement of renewable natural gas ("RNG") as a clean, green, alternative and domestic energy and fuel resource. The RNG Coalition’s membership includes companies throughout the value chain of waste feedstock conversion to transportation fuel, including producers of RNG throughout North America.

APGA represents over 730 public gas systems across the country. Its members are retail distribution entities owned by, and accountable to, the citizens they serve. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies that own and operate natural gas distribution facilities in their communities.

CNGVC is an association of natural gas vehicle and engine manufacturers, utilities, fuel providers and fleet operators serving the state of California, united in the belief that wider adoption of clean-running NGVs—a proven technology in use worldwide—is key to helping California reduce greenhouse gas emissions, air pollution and petroleum dependence. The Coalition is the industry’s premier advocacy organization in the state, supporting new initiatives, providing up-to-date information on NGV technology and market developments, and working with legislators and regulators to develop policies that will increase alternative fuel and vehicle use. CNGVC also advises stakeholders on testing and demonstration programs and help NGV-related businesses break into the California market.

Comments

The joint commenters support EPA’s Cleaner Trucks Initiative and efforts to promote the development and deployment of lower emission motor vehicles. Lower emissions of the medium- and heavy-duty vehicles which are the focus on this rulemaking is particularly critical. Trucks and buses powered by medium- and heavy-duty engines contribute a disproportionate amount of pollution in urban areas throughout the U.S. In many cases, trucks and buses are the most significant contributors to ozone pollution and smog. This is not because cleaner technology does not exist but rather because cleaner technology is not being deployed in effective numbers and older, higher polluting vehicles remain on our roads and in-use.

A number of state and local authorities have requested that EPA adopt a new NOx limit of 0.02 grams per brake-horsepower-hour (0.02 g/bhp-hr), a level that is 90 percent more demanding than the current federal limit of 0.2 g/bhp-hr. California state authorities are considering the adoption of new engine standards that could include moving to this 0.02 NOx level.

Engine manufacturers that produce EPA and California Air Resources Board (CARB) certified natural gas-powered engines already meet this standard and more, cleaner natural gas engines are on the way as a result of research and development programs that include additional development of lower-polluting engines and also hybridization of
natural gas platforms. Businesses that produce lower polluting natural gas engines and vehicles can deliver the benefits this rulemaking seeks without having to wait for new developments or even to satisfy the lead time requirements imposed on EPA. Natural gas-powered vehicles also provide significant reductions of greenhouse gas emissions due to the fact that an increasingly larger percentage of natural gas used in the on-road transportation market is sourced from renewable natural gas.

This rulemaking by the EPA can lead the way for new, cleaner emission standards; but it also could have much greater impact by shaping future policies affecting the turnover of older, more polluting vehicles. There is no reason to wait to act until new standards are developed and implemented since vehicles and engines powered by natural gas are already available today, delivering significant emission reductions across every on-road application.

The joint commenters urge the EPA to not only consider regulations affecting the certification of new engines and vehicles but also to incorporate a comprehensive list of policies that it and other federal agencies can pursue to ensure that new, cleaner powered trucks are deployed faster, smarter, and more affordably with performance based measures that target cost-effective emission solutions. Using domestic and sustainable natural gas as a transportation fuel provides an immediate solution to significantly reduce criteria pollutants that contribute to toxic air. Virtually all new natural gas engines available in the marketplace today already are certified to the 0.02 standard that is under discussion.

It is important to note that these Ultra-Low NOx natural gas engines – commercially available, scalable and supported by a mature infrastructure of fuelers and suppliers today – perform at or below certification standards during a full range of duty cycles, though changes might be necessary due to proposed changes in emissions useful life and warrantee. A report by the University of California Riverside’s College of Engineering – Center for Environmental Research and Technology found that while natural gas technology was cleaner than certified across duty cycles, its heavy-duty diesel counterparts emitted higher levels of NOx than their certification standards in the same duty cycle.1

Further, a November 2019 study by the International Council on Clean Transportation found that a disproportionate amount of NOx emissions from heavy-duty diesel vehicles is emitted during low-speed operation characteristic of urban driving.2 By contrast, natural gas engines in the same study were shown to thrive in such operational environs.

---

Natural gas vehicles also offer significant climate change benefits. Compared to diesel, natural gas engines fueled with geologic natural gas reduce CO$_2$ and greenhouse gas emissions by at least 12 percent depending on fuel efficiency. When fueled with renewable natural gas (RNG or biomethane) captured from agricultural, food, landfill or wastewater, even greater CO$_2$ and greenhouse gas benefits are achieved, up to 331 percent lower than diesel.\(^3\) Renewable natural gas supplies can be delivered to customers for direct use or blended with supplies of conventional natural gas either as CNG or LNG as needed to provide low emissions. RNG currently accounts for more than 30 percent of the fuel used in on-road vehicles, and many fuelers are committed to ensuring much higher levels in the near future.

Investments in Ultra Low-NOx and Near Zero emission natural gas vehicle technologies greatly benefit communities, especially the underserved and marginalized communities in metropolitan and industrial areas. With vehicle costs close to that of diesel and fuel price differentials of up to $1.50 less than diesel fuel per diesel gallon equivalent, natural gas transportation provides the largest and most cost-effective reductions in transportation-related pollutants than any other powertrain option commercially available today or near-term.\(^4\)

Natural gas is a viable transportation fuel for a variety of applications from medium- and heavy-duty on-road vehicles, including short-haul and regional trucking, refuse trucks, school buses, utility and other work trucks, and transit buses of all types. For this reason, natural gas as a transportation fuel provides the most significant near-term and long-term opportunity to deliver meaningful and cost-effective emission reductions for fleets and communities. Despite these advantages, regulatory treatment and the lack of incentives for natural gas vehicles continues to limit the market penetration of new natural gas vehicles.

Included here are recommendations and suggestions for policies and programs that can advance the use of cleaner powered trucks including those powered by natural gas and renewable natural gas. EPA and other federal agencies should:

1. Provide averaging, banking and trading emission credits including expanded credits for manufacturers of natural gas engines and vehicles and other technologies that achieve the 0.02 NOx ahead of schedule;
2. Provide enhanced SmartWay designations for trucks powered by low-NOx engines and fueled by carbon-neutral or even carbon-negative fuels;
3. Modernize testing standards to include evaluation across the full range of in-use duty cycles, rewarding technologies that consistently meet certification levels at urban, suburban, and highway speeds and offer a multi-step compliance pathway;

\(^3\) Dependent upon RNG source. Reductions of 45% up to 331% compared to diesel; values based on CARB LCFS program data under CA-GREET 3.0.

\(^4\) [https://www.ngvamerica.org/environment/](https://www.ngvamerica.org/environment/)
(4) fund pilot programs and infrastructure development that demonstrate the ways in which natural gas and other low-NOx vehicles can be used to power a variety of different transportation sectors by supporting the purchase of low-NOx vehicles and equipment at multimodal facilities such as ports and rail facilities;

(5) ensure that federal funding provided under the CMAQ Program and the DERA Program are competitively awarded for projects that provide the most cost-effective emission reductions and offer increased funding levels for engines and vehicles that are certified to more demanding standards in advance of EPA’s adoption of such standards – provide a set aside in these programs to specifically encourage purchase of low-NOx engines and vehicles;

(6) work with state authorities to ensure that transportation policies include performance metrics and consider a variety of different technologies as opposed to only promoting specific technologies regardless of their cost;

(7) work with state authorities to ensure that they give effect to the recently enacted weight allowance (i.e., 2,000 lb.) for natural gas trucks operating on the federal interstate system and consider extending this provision to state roads to maximize the benefit of this provision;

(8) work with Congress to extend the alternative fuel tax credit (AFTC) for natural gas and other fuels used as motor vehicle fuel for a minimum of five years to stimulate real demand for cleaner new truck purchases;

(9) work with Congress to amend the federal excise tax on new trucks to reduce the impediment to fleets and businesses purchasing cleaner new trucks by either eliminating the tax altogether since it discourages new purchases or amend the tax so that it does not penalize more costly, lower polluting technologies (i.e. eliminate the excise tax on the incremental cost).

**Conclusion**

The joint commenters appreciate the opportunity to provide comment on EPA’s Cleaner Truck Initiative and welcome the opportunity to work with the Administration as it continues to craft these important new standards.
For follow up or questions concerning these comments, please contact:

Jeff Clarke  
NGVAmerica  
400 N. Capitol Street, NW  
Washington, DC 20001  
202.824.7364  
jclarke@NGVAmerica.org