



Testimony of Incoming NWRA Chairman Don Ross

April 12, 2022

Good morning. Thank you for this opportunity to testify on the important issue of Control of Air Pollution from New Motor Vehicles for heavy duty engine and vehicle standards. My name is Don Ross and I run the sales and marketing for the McLaughlin Family Companies, including New Way Trucks, our waste and recycling truck line. Today, I am speaking to you as the incoming chairman of the National Waste and Recycling Association. NWRA is the trade association representing the private sector waste and recycling industry that is essential to maintaining the quality of American life by protecting public health and the environment. The delivery of waste and recycling services impacts all residential, commercial, and industrial properties on a daily basis. Our members collect, process, and manage waste, recyclables, organics, operate and manage landfills in compliance with all federal and state laws; manage and service truck fleets and collection vehicles; and design, manufacture, sell, and service equipment and supplies.

As the companies that facilitate and execute recycling throughout the country, we support EPA's goals to make the environment a better place and increase the cleanliness and efficiency of the vehicles our companies produce and operate. We do not want to have a regulation that limits the strides our manufacturers and operating companies are already taking to incorporate ZEV into our fleets. An overly burdensome prescriptive standard could limit or slow down the momentum that is currently occurring in the transition to battery electric vehicles. My company and many other NWRA-member truck manufacturers are already seeing an uptick in the request and ordering of ZEV. We simply ask that EPA institute a technologically feasible rule.

NWRA member companies have a unique perspective in that we represent the manufacturers, such as myself, and the haulers such as WM, Republic, GFL, and Waste Connections, along with over 700 other members. This enables us to understand the impact that new air pollution regulations would have particularly on the short-haul trucking industry.

Our drivers start and stop hundreds of times a day, averaging as low as 9 to 12 MPH throughout the day, equating to a run time of 4,500 hours over two years, instead of the 4,500-hour run time for one year used in the proposed regulation. We ask that EPA consider what the maximum number of hours a driver could drive in a year based on FMCSA's hours of service regulations be used to calculate the warranty hours that are being proposed.

With the projected adoption of battery electric vehicles in the waste industry, we ask that EPA work with USDOT to resolve the issue of heavier battery vehicles needing to reduce the amount of mass they can haul to comply with truck weight restrictions. EPA and USDOT should work together to minimize pollution without sacrificing cargo carrying capacity of vehicles. This potential reduction of cargo capacity should also be included in EPA's economic analysis of the rule.

NWRA commends EPA on beginning to break out short-haul and long-haul trucking as in terms of effective pollution controls. EPA's recognition that the start-stop and short distances traversed by short-haul drivers between stops potentially limits the ability of some pollution control devices to work effectively since they would not get to a high enough temperature. We ask that EPA work with short-haul companies and manufacturers to find viable alternatives.

Again, thank you for this opportunity to speak on this important issue of increasing the efficiency of the vehicles that make this country run while protecting Americans. I look forward to a robust discussion on the topic moving forward. Thank you.