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June 5, 2023

The Honorable Michael Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

RE: Docket ID EPA-HQ- OAR-2023-0216:FRL010833-01-OAR; Development of Guidance for Zero-Emission Clean Heavy-Duty Vehicles, Port Equipment, and Fueling Infrastructure Deployment Under the Inflation Reduction Act Funding Programs

Dear Administrator Regan:

The National Waste & Recycling Association (NWRA) appreciates this opportunity to provide comments on the Environmental Protection Agency's (EPA) Development of Guidance for Zero-Emission Clean Heavy-Duty Vehicles, Port Equipment, and Fueling Infrastructure Deployment Under the Inflation Reduction Act Funding Programs. NWRA is the trade association that represents private-sector waste and recycling companies in the United States as well as the manufacturers and service providers who do business with those companies. NWRA's members operate in all fifty states and the District of Columbia. NWRA provides safety, education, research, leadership, and advocacy expertise to promote the North American waste and recycling industries and create a climate where members prosper and provide safe, economically sustainable, and environmentally sound services.

As the industry that facilitates and conducts recycling throughout the country, NWRA members support EPA's goals to make the environment a better place and increase the cleanliness and efficiency of the vehicles their companies produce and operate. NWRA encourages EPA to incorporate a category of funding for waste and recycling vehicles especially those operated in urban and suburban locations as these are where companies are already incorporating zero emission vehicles (ZEV) into our fleets. NWRA-member truck manufacturers are already seeing an uptick in the request for and ordering of ZEVs. NWRA requests that EPA incorporates funding to help manufacturers expand the range and capacity for ZEVs in the waste and recycling industry. Our members operate a wide variety of class 6,7, and 8 vehicles.

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We encourage the EPA to expand funding opportunities for class 8 short haul vehicles.

NWRA's, more than 700 member companies have a unique perspective in that the association represents both the manufacturers of heavy-duty trucks including Mack, Volvo, Freightliner, and AutoCar as well as the haulers who buy from them such as WM, Republic, GFL, and Waste Connections among many others.

With the projected adoption of ZEVs in the waste industry, we ask that EPA work with the U.S. Department of Transportation (USDOT) to resolve the challenges created by the increased weight of heavy batteries on EVs, which requires our fleet 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 the cargo carrying capacity of vehicles.

We also ask that EPA work with the Department of Energy to understand the electrical load that would be needed to electrify the heavy-duty truck fleet. NWRA members are concerned that the electrical infrastructure is not expanding fast enough to support an electrified fleet.

NWRA appreciates the opportunity to comment on the Development of Guidance for Zero-Emission Clean Heavy-Duty Vehicles, Port Equipment, and Fueling Infrastructure Deployment Under the Inflation Reduction Act Funding Programs and we look forward to continuing to work with EPA on this matter. Should you have any questions, please contact Kirk Sander at ksander@wasterecycling.org or 202-364-3750.

Very truly yours,

Darrell K. Smith, PhD
President & CEO