

NACAA Questions for EPA on Heavy-Duty Truck NPRM

For NACAA Mobile Sources and Fuels Committee Zoom Meeting
Tuesday, March 22, 2022
2:00-3:00 PM EDT

In addition to briefing NACAA members on the “Alternative” included in the proposed rule, please answer the following questions regarding the proposal:

- 1) Why did EPA not propose an option that is identical to ARB’s HD Omnibus? What did EPA see differently than ARB that led the agency to land on a proposed option that is close, but different?
(David Bizot, Wisconsin)
- 2) Will you please explain, generally, the changes EPA is proposing in the “Compliance Provisions and Flexibilities” section of the NPRM regarding “inducements” for maintaining SCR (pp. 412-453)? How would significantly relaxed inducements – like limiting top speed to *no lower* than 50 mph, rather than 5 mph – more effectively result in truck operators properly maintaining SCR?
(Nancy Kruger, NACAA)
- 3) On pp. 509-514, EPA outlines two “Other Flexibilities under Consideration” on which EPA requests comment:
 - a. Please explain the “Interim In-Use Standards” for HHDEs on which EPA requests comment (pp. 509-513). How far over the actual proposed numeric standard would EPA’s range of potential interim in-use standards (p. 512) allow emissions to go (to what level)? In which “few cases” (p. 510) has EPA allowed interim or temporary higher numerical in-use standards and for what type of in-use test(s)?
 - b. Please explain the “Production Volume Allowance for MYs 2027 through 2029” on which EPA requests comment (pp. 513-514), under which EPA would allow manufacturers to continue to certify up to 5 percent of their total production volume of HD diesel engines in each of MY 2027 through MY 2029 to “pre-MY 2027 engine provisions.” How does EPA define “pre-MY 2027 engine provisions”? In the proposal, EPA writes that a production volume allowance may be necessary for some low sales volume specialty products and provides fire trucks as an example. What, exactly, would qualify as a low sales volume specialty product and who would determine whether a specific product qualifies?
(Nancy Kruger, NACAA)