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November 5, 2019

Ms. Kathleen Theoharides, Chair
Transportation & Climate Initiative of the Northeast and Mid-Atlantic States
Georgetown Climate Center
600 New Jersey Avenue, N.W.
Washington, DC 20001

Dear Secretary Theoharides:

The National Waste & Recycling Association (NWRA) appreciates the opportunity to offer the following comments on the Transportation & Climate Initiative (TCI) Framework for a Draft Regional Policy Proposal. NWRA is a non-profit trade association representing private companies that collect, process, and manage solid waste and recycling. As discussed below, NWRA is supportive of initiatives that recognize the demands of the waste and recycling collection industries, support the transition to less emissions-intensive fuels, and benefit the communities we serve.

I. On-Road Fuel Use in the Waste and Recycling Industry

The waste and recycling industry operates a fleet of more than 100,000 collection vehicles, traditionally composed of heavy-duty trucks operating on diesel fuel, that is capable of handling the high energy demands of compacting and the need for frequent stops and starts. These trucks operate in all fifty states, in rural and urban centers, and in residential and commercial areas.

Recognizing the benefits of moving towards clean fuels, a growing number of public and private sector fleets are investing in waste and recycling trucks that run on natural gas. Currently, over 17,000 existing collection vehicles run on natural gas and approximately 60% of new purchases are natural gas vehicles. The industry recognizes that transitioning from traditional diesel fleet to compressed natural gas vehicles is a cost-effective¹ means of reducing smog-causing NOx emissions by as

¹ Heavy-duty vehicles running on natural gas are available at comparable lifecycle costs to vehicles running on diesel as a result of their reduced operating costs.

much as 97 percent,² diesel particulate matter by 94 percent, and greenhouse gas emissions by 15-20 percent over current levels. For every diesel truck replaced with natural gas, our industry reduces its use of diesel fuel by an average of 8,000 gallons per year along with a reduction of 14 metric tons of greenhouse gas emissions per year. Compressed natural gas vehicles also are quieter than diesel-fueled vehicles, offering quality-of-life benefits to our customers and the communities served by our industry.³

Our industry operates nearly 600 landfills across the United States where landfill gas is converted into renewable energy. Currently about 10% of those convert the landfill gas into renewable natural gas (RNG) where it can be used as vehicle fuel either through pipeline injection or through local use. Natural gas engines fueled with RNG represent commercially available and deployable investments to reduce harmful air emissions, with RNG providing substantial reductions in greenhouse gas emissions for every diesel fueled vehicle replaced.⁴ The RNG industry has experienced rapid growth in recent years. As such, RNG currently fuels over 32 percent of natural gas vehicles in the United States,⁵ further benefiting the communities served by our industry.⁶

II. Reducing Vehicle Emissions in Targeted Communities

Marginalized communities in urban areas historically have borne a disproportionate share of the adverse impacts of pollution given their proximity to traffic from major roadways, industries, and densely populated neighborhoods. As a critical environmental justice issue, RNG trucks should be prioritized to operate in these areas.⁷

NWRA encourages TCI jurisdictions to recognize the importance of natural gas—and RNG in particular—as providing the most cost-effective solution available now and for the foreseeable future for the reduction of vehicle emissions in our industry.

² 2019 Cummins Westport near-zero emission natural gas engine—the cleanest heavy-duty engine ever certified by the California Air Resources Board and the U.S. Environmental Protection Agency

³ See *Case Study—Compressed Natural Gas Refuse Fleets*, U.S. DEPT. OF ENERGY (Feb. 2014).

⁴ See *California-Modified Greenhouse Gases, Regulated Emissions, and Energy Use in Transportation v. 3.0*, ARGONNE NATIONAL LABORATORY (reflecting values based on California Low Carbon Fuel Standard program data). In 2014, EPA certified RNG as a cellulosic biofuel under the Renewable Fuel Standard, recognizing that its production avoids greenhouse gas emissions through the capture of landfill methane releases and the displacement of fossil fuel use in vehicles. See 79 Fed. Reg. 42,127, 42,139 (Aug. 18, 2014).

⁵ See *Renewable Natural Gas On-Road Fuel Reaches Historical High*, NGVAMERICA (Apr. 16, 2019), at <https://www.ngvamerica.org/2019/04/16/renewable-natural-gas-on-road-fuel-reaches-historical-high/>.

⁶ Over 40 percent of Waste Management’s natural gas fleet currently is fueled with RNG produced at its landfills, supporting its long-term strategy of creating a near-zero emissions collection fleet. And, Republic Services use of RNG is projected to reduce emissions by 250,000 metric tons of CO₂e annually.

⁷ TCI jurisdictions may be informed by New York’s “Clean Transportation NY” plan, for example, which prioritizes emissions reduction in heavy-duty vehicles in low-income and minority communities with disproportionately high levels of exposure to nitrogen oxides and diesel particulate matter.

Accordingly, TCI jurisdictions should consider the environmental and societal impacts accompanying the transition away from diesel fuel use in heavy-duty vehicles and invest program revenues in RNG-capable vehicles in communities that are disproportionately impacted by air and noise pollution.⁸

NWRA welcomes the opportunity to provide input on TCI's framework document and look forward to working with all stakeholders to facilitate a successful and equitable program. If you have any questions about our comments, please feel free to contact Anne Germain at 202-364-3724 or agermain@wasterecycling.org.

Very truly yours,

A handwritten signature in black ink that reads "Darrell K. Smith". The signature is written in a cursive style with a large initial 'D' and 'S'.

Darrell K. Smith
President & CEO
National Waste & Recycling Association

⁸ NWRA also encourages TCI to consider a framework that allows regulated parties to offset their compliance obligations through investment in RNG-capable vehicles that demonstrate reduced air emissions in environmental justice communities.