

Testimony of Diana Van Vleet, Director of Media Advocacy, American Lung Association

December 4, 2017

Docket ID No. EPA–HQ– OAR–2014–0827:

Proposed Repeal of Emission Requirements for Glider Vehicles, Glider Engines, and Glider Kits

Docket ID No. EPA– HQ-OAR-2017-0355:

Proposed repeal of the Clean Power Plan

Good Morning. I am Diana Van Vleet, Director of Media Advocacy for the American Lung Association’s Healthy Air Campaign. The American Lung Association’s mission is to save lives by preventing lung disease and promoting lung health.

Before I talk about the dirty diesel truck loophole, I would like to first urge EPA not to repeal the life-saving Clean Power Plan. Last week, I traveled to West Virginia to testify and ask you to fully implement the Clean Power Plan at the formal public hearing, but I would like to repeat this in EPA’s own building. According to the EPA 2017 analysis, the Clean Power Plan would prevent 4,500 early deaths every year once it was fully implemented in 2030. That means this proposed repeal would result in up to 4,500 deaths every year needlessly. The Clean Power Plan will cut pollution and save lives. Please do not repeal this lifesaving rule. Please include my comments in Docket ID No. EPA– HQ-OAR-2017-0355.

Moving back to dirty trucks: the dirty diesel truck loophole threatens public health. The proposal to reopen the dirty diesel truck loophole is a dirty deal for one manufacturer trying to avoid complying with the rules like rest of the industry must do. EPA estimated that closing the diesel trucks loophole **will prevent up to 1,600 premature deaths** over the lifetime of the trucks sold only in 2017.¹ I strongly oppose EPA’s proposal to open this lethal loophole and urge EPA to withdraw this proposal.

EPA has clear legal authority to regulate the dirty trucks, known as “gliders,” under the Clean Air Act. The Clean Air Act unambiguously intended for EPA to regulate these vehicles and not let them drive through a dirty diesel truck loophole. Not only does EPA have the authority to make sure these super polluters aren’t spewing dangerous emissions into the air, EPA has the responsibility to do so. EPA’s purpose and mandate under the Clean Air Act is “to protect and enhance the quality of the Nation’s air resources so as to promote the public health and welfare.” This proposal contradicts that mandate.

Let’s break down just how much dirtier these glider trucks actually are. EPA has found that:

- Particulate matter emissions from a dirty diesel truck were 450 times higher than a comparable 2014 or 2015 model year truck.²
- By 2025 the dirty diesel trucks will create an additional **190,231 tons per year of NOx** and an additional **5,064 tons per year of particulate matter**.³

Getting down to brass tacks, what does all of this additional dangerous air pollution mean for the health of Americans? Traffic pollution causes asthma attacks in children, and may cause a wide range of other effects including: the onset of childhood asthma, impaired lung function, premature death and death

¹ Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles - Phase 2 Response to Comments for Joint Rulemaking <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100P8IS.PDF?Dockey=P100P8IS.PDF> p. 1965

² HD Chassis Glider Final Report 11202017 <https://www.regulations.gov/document?D=EPA-HQ-OAR-2014-0827-2417> p. 3

³ Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles - Phase 2 Response to Comments for Joint Rulemaking <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100P8IS.PDF?Dockey=P100P8IS.PDF> p. 1962

from cardiovascular diseases, and cardiovascular morbidity. **People who live within 500 meters of a highway are especially vulnerable to air pollution from traffic**, including from dirty diesel trucks.

The pollutants from glider trucks are seriously dangerous. **The International Agency for Research on Cancer (IARC), which is part of the WHO, has classified diesel engine exhaust as a Group 1 carcinogen**, associated with an increased risk for lung cancer. Particulate matter triggers asthma attacks, heart attacks and strokes, causes lung cancer and premature death and is linked to low birth weight. NOx is a primary ingredient in ozone or smog. Ozone causes asthma attacks, coughing, wheezing, shortness of breath, cardiovascular harm and premature death.

Right now, people all across America are already suffering the health consequences of vehicle pollution exposure. For example, Lung Association volunteer Carol M. from North Carolina wrote to us recently because she was greatly concerned about the long-term effect of breathing in pollution emitted from vehicle tailpipe exhaust, both for her family and her community. After frequently seeing high-school students walking home from school, unable to avoid walking through the thick cloud of exhaust from trucks and city buses driving by, she decided it was time to speak up.

Carol wrote, “Many people don’t realize just how polluted their local air may be, because the exhaust given off by cars, trucks, buses, leaf blowers, and other sources is loaded with microparticles that are simply too small for us to see.”

This is about fair enforcement of a commonsense rule that save lives. Super-polluting trucks shouldn’t get a backroom favor so that they can spew harmful pollutants into the air that people have no choice but to breathe. Americans didn’t sign up for that. We deserve to breathe air that won’t make us sick.

I urge you to hold polluters accountable, make everyone play by the existing, fair rules, and withdraw this proposal. Lives depend on it.