



Nevada Division of Environmental Protection (NDEP) Comments on CARB Heavy-Duty Engine and Vehicle Omnibus Regulation and Associated Amendments

General Support for Stringent NOx Emission Standards for Heavy-Duty Trucks and Engines

The Nevada Division of Environmental Protection (NDEP) supports the establishment of new, more stringent nitrogen oxide (NOx) emission standards and related requirements for highway heavy-duty trucks and engines. **Almost 70% of NOx emissions in Nevada are generated by mobile sources, for which federal standards are essential for control and reduction.**

Description of the Nevada NOx Emissions from Heavy-Duty Trucks and Engines

- In Clark County, the Las Vegas Valley was designated marginal nonattainment for the 8-Hour 2015 Ozone National Ambient Air Quality Standards (NAAQS) in August, 2018. In the nonattainment area, 10-15% of the NOx emissions are attributed to heavy-duty engines.
- Washoe County is currently designed in attainment for the 2015 ozone NAAQS, however, recent ozone design values have been close to 100 percent of the NAAQS. On-road motor vehicles, including heavy-duty trucks, represent the largest source of NOx emissions in the County.
- Nevada is home to many warehouses and distribution centers that generate heavy-duty traffic. And, Interstate 80 in the North and Interstate 15 in the South, are major routes for heavy-duty trucks to and from California.

Nevada's geographical location, immediately downwind of California, presents a challenge for the maintenance and improvement of air quality in the State as most of the State and local stationary sources of NOx emissions that fall under Nevada's air quality agencies are already well controlled.



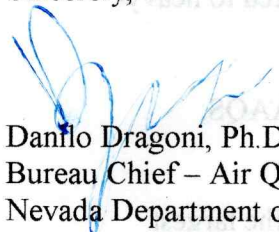
State Mitigation Attempts

Recognizing that NOx emissions from transportation are a major issue in its metropolitan areas, Nevada has been devoting almost 80% of its Volkswagen Environmental Settlement allocation to funding private and public initiatives to reduce NOx emissions.

Support for CARB Heavy-Duty Omnibus

NDEP supports the swift establishment of a single national highway heavy-duty truck and engine program. But in the absence of such initiative NDEP supports the new, more stringent standards as proposed in the Heavy Duty Omnibus regulations; the proposed standards and regulations will achieve, among others, a reduction in NOx emissions of at least 75 percent from current in-use levels starting with model year 2024 and 90 percent with model year 2027. NDEP supports the implementation and adoption of technologies and compliance and performance testing across all duty cycles of heavy-duty truck operations that will lead to a reduction in NOx emissions.

Sincerely,



Danilo Dragoni, Ph.D.
Bureau Chief – Air Quality Planning, Nevada Division of Environmental Protection.
Nevada Department of Conservation and Natural Resources