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## National Waste & Recycling Association<sup>SM</sup>

April 28, 2025

Illinois Pollution Control Board

Docket Number R2024-17

Delivered electronically to: Don Brown [Don.Brown@illinois.gov](mailto:Don.Brown@illinois.gov)

Submitted by: National Waste & Recycling Association

The Illinois Chapter of the National Waste & Recycling Association (NWRA) appreciates the opportunity to provide comments on the proposed rule that would require Illinois to adopt California's Advanced Clean Trucks Standards (R2024-017 Rulemaking-Air).

NWRA is a trade association that represents both publicly-traded and privately-owned companies that provide collection, recycling, and disposal of waste materials generated by communities and businesses throughout the State of Illinois. For the reasons stated below, NWRA opposes Illinois' adoption of the Advanced Clean Truck Standards proposal.

As the industry that facilitates and conducts recycling throughout Illinois, NWRA supports efforts to improve the environment by increasing the cleanliness and efficiencies of the vehicles the industry operates. However, NWRA does not support a regulatory environment that limits the strides our operating companies have taken to incorporate low-carbon-fueled vehicles.

Our sector is increasingly committed to alternative fuel options, including natural gas vehicles, electric vehicles, and other technologies that help to reduce overall emissions. Many industry stakeholders have been transitioning from legacy diesel models to natural gas vehicles capable of running on renewable natural gas (RNG)—fuel produced from landfill methane emissions that often has a lower average carbon intensity than electricity.

Using RNG produced from landfills in waste collection vehicles, for example, reduces greenhouse gas emissions by over 80 percent, nitrogen oxide emissions by as much as 97 percent, and diesel particulate matter by 94 percent, as compared to the diesel vehicles they replace. RNG production also can lead to water and air quality benefits beyond the production of the renewable fuel itself, providing environmental and societal benefits, especially in communities that are disproportionately impacted by air, water, and noise pollution. In Illinois, the waste and recycling industry operates a statewide fleet of natural gas vehicles.

Adoption of the Advanced Clean Trucks Standards would sideline the efforts and investments that NWRA members have made in advancing the circular economy by capturing landfill methane emissions and using this waste stream to reduce the environmental impact of their vehicles. These efforts would be replaced by an unrealistic and unworkable regulation. Compliance with the 20% electric truck delivery requirement by 2028 is impracticable if not impossible given that electric truck manufacturing is in its infancy and there are virtually no electric trucks available in Illinois today.

Meeting the California Standards is difficult even when vehicles are available. A half-dozen states—including Massachusetts, New Jersey, New Mexico, New York, Oregon, and Washington—are considering delaying adoption or enforcement of the Advanced Clean Fleet Standard, noting challenges in meeting the strict timelines of the rule. For example, Maryland Governor Wes Moore (D) issued an Executive Order last month delaying penalties associated with the standards for two years. The Order also created a stakeholder Task Force to develop strategies for successful implementation of the Advanced Clean Car Standards in Maryland. And on April 14, the Massachusetts Department of Environmental announced that it will exercise enforcement discretion that effectively puts a two-year delay on implementation of the Standard. With electric truck manufacturing in its infancy, the actions taken in Maryland and Massachusetts should give the Board pause as it considers adoption of the Advanced Clean Truck Standard.

It is also noteworthy that Illinois' truck charging infrastructure is largely nonexistent. Building out the charging infrastructure required to sustain electric trucks moving throughout the State is a long-term process, and the process will not be accomplished to the extent needed to accommodate the large influx of electric trucks that this regulation would require.

NWRA members, many of whom have invested in the infrastructure required to fuel their alternative fuel-powered trucks, would be required to incur additional expense at their fleet sites to charge electric trucks.

Adoption of the Advanced Clean Truck Standards would replace the waste industry's alternative fuel truck strategy that has successfully reduced greenhouse gas emissions, nitrogen oxide emissions, and diesel particulate with an unworkable and costly regulation developed by the State of California. For the reasons stated above, we respectfully request that the Pollution Control Board reject implementation of the Advanced Clean Truck Standard in Illinois.

Sincerely,

LISA DISBROW  
Illinois Chapter Chair  
NATIONAL WASTE & RECYCLING ASSOCIATION